Pt. 5



United States Environmental Protection Agency, Region III Corrective Action Program

Environmental Indicator Inspection Report

for

Kiwi Brands Inc.
Douglassville, Pennsylvania
EPA ID# PAD097153399

Prepared By

United States Army Corps of Engineers Philadelphia District

December 1, 1998

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RCRA SITE INSPECTION REPORT KIWI BRANDS, INC. 10 SEPTEMBER 1998

Purpose: To gather relevant information from high priority RCRA facilities to determine whether or not human exposures and groundwater releases are controlled.

Documentation Review: On Wednesday, September 9, 1998 an extensive record search took place at the USEPA Regional office located on Arch Street in Philadelphia. The file search included the review of various documents for RCRA permit applications, historical spills and releases, closure documents, correspondences between USEPA, PADER and Kiwi Brand documentation of previous environmental investigations or studies. Documents obtained curing the facility file review and site inspection are presented in Appendix B.

Meeting Summary: The environmental indicator inspection commenced at 10:00 a.m. on Thursday, September 10, 1998. Dr. Mellinger presented an overview of Kiwi's manufacturing activities and processes, and an overview of the company's history at the site. The presentation included a description of the Solid Waste Management Units (SWMUs) located at the facility, the RCRA permit application history for the facility, and hazardous waste generation and management practices. Upon completion of the meeting the inspection of the facility commenced. Pictures contained in Attachment 2 were taken the day of the site inspection.

Attendees:

Name	Agency/Company	Phone #
Linda Matyskiela	EPA	215-814-3420
Susan Werner	PADEP	610-916-0100
Dr. Michael Mellinger	Kiwi Brands	610-385-9246
Chris Brown	USACE	215-656-6700
Scott Evans	USACE	215-656-6784
Jeff Hendel	USACE	215-656-6887

A. Location and operational history of the facility, including all wastes generated at the facility and their management.

The Kiwi Brands facility is located on Route 662, Douglassville Township, Berks County, Pennsylvania (see Figure 1). Operation at this facility began in 1980 after Kiwi Brands moved from Pottstown, PA. This particular Kiwi Brands facility manufacturers a variety of shoe care and toilet bowl products (i.e., shoe polish, cleaners, etc.). The facility is located in an agricultural/residential/light industrial area, which is served by public water and sewer. Primarily, the hazardous waste generated by the Kiwi facility includes various forms of waste shoe polish, bleach toilet bowl tablets, cleaning solvents, and aerosol containers. A site map is available as Figure 2.

From 1980 until 1986, the facility utilized mercury containing products in its manufacturing process. In 1986 the facility stopped using mercury containing products and, as a result, did not

continue to seek a Part B permit. Also, Dr. Mellinger indicated that wastes have always been stored for less than 90 days. Compliance with this permit ensures that hazardous waste is handled in a controlled manner that is protective of human health and the environment. Permits also serve as an implementation mechanism, and as a means by which EPA can track waste management at facilities that choose to handle hazardous waste. Also, accumulating waste on a site for less than 90 days is an exemption for permit filing.

B. Description of all Solid Waste Management Units (SWMUs) and/or Areas of Concern (AOCs) as well as description of known and/or potential releases.

Current Solid Waste Management Units

- Main Drum Storage Area storage area for drums containing hazardous and non-hazardous waste waiting for off site disposal. The drums were properly labeled and dated. The storage area is surrounded by a chain link fence that is kept locked and has steel sealed curbing with soft dikes at the access points for tow motors to enter and exit. See Figure 3 and Picture 1.
- <u>Aerosol Waste Storage Area</u> storage area for drums containing waste aerosol cans
 waiting for off site disposal. The storage area is located in a special room that has been
 designed for storing aerosol containers. The room has automatic closing doors and gates
 in the event of fire and a fire suppression system. All waste containing drums were
 properly labeled and dated. See Figure 3 and Picture 2.
- Evaporating Unit The facility has three stainless steel lined concrete pits in the rear of the building that are used to evaporate liquid waste from the production lines. Sludge from the pits is disposed of off site as a non-hazardous waste. Prior to 1986, sludge containing mercury was produced from the evaporator unit. Sludge produced by the evaporator is characterized before disposal. Refer to Figure 3 and Pictures 3 & 4.

Areas of Concern

• Flammable Liquids Storage/Fill Area – Storage area for drums containing flammable liquids. The area is located in a fire/explosion proof room and has appropriate secondary containment. All drums are properly labeled and dated. See Figure 3 and Picture 5.

Past hazardous material releases at the site include the following:

• January 29, 1988 – 700 gallon mineral spirits release (refer to Figure 4). During a bulk delivery of mineral spirits to an underground storage tank, a faulty tank level indicator was the cause of a tank overfill. Cleanup operation were immediately undertaken, and included collection of any recoverable mineral spirits, excavation of approximately 120 tons of contaminated soil, and installation of three recovery wells. In a letter from Mr. Mellinger to Ms. Susan Kinkaid of PADEP dated November 23, 1994, Kiwi presented a "Certificate of Soil Remediation" from Soil Remediation of Philadelphia, Inc. confirming that the soil contaminated by the release was properly disposed. In late 1993, Kiwi

with Sep = 1994,

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removed the UST containing the mineral spirits and replaced it with above ground storage tanks. In a letter from Mr. Mellinger of Kiwi Brands to Mr. F. William Noll of PADEP dated August 29, 1995, Kiwi presented analytical data of groundwater associated with the UST removal.

- September 6, 1988 Unknown amount of a surfactant (Neodol 25-7) released. During unloading of the raw material, tank overfill released an unknown amount of surfactant onto the building's rooftop, down rainwater downspouts, and flowed into an on-site fire pond. In a letter dated October 10, 1989 from PADER, "Kiwi has demonstrated to the Department's [Pennsylvania DEP] satisfaction that the neodol 25-7 spill has been sufficiently remediated through the temporary storage of affected pond sludge and biodegradation on the neodol 25-7." See Figure 4.
- July 24, 1990 35 to 50 gallons of mineral spirits were released at an UST area during unloading operations. According to a letter from Mr. David Cusumano, Senior Environmental Chemist of Kiwi Brand to Mr. Kerry Leib of PADEP dated April 7, 1992; "Remedial action which was taken included purging the three recovery wells which are located by the spill area". Also, according to the letter, "Additionally, as part of the measures implemented to prevent future spills during truck unloading operations, Kiwi Brands Inc. has installed a tank overfill protection system".

C. Description of exposure pathways for all releases or potential releases.

- <u>Air:</u> There are several residential homes surrounding the facility that could be affected by air contamination.
- Groundwater: Unknown exposure pathway.
- Surface Water: Unknown exposure pathway.
- <u>Soil:</u> The facility is not surrounded by a fence. Therefore, trespassers could be exposed to any contaminated soil.

D. Exposure pathway controls and/or releases controls instituted at the facility.

- Air: There are no pathway or release controls instituted at this time.
- Groundwater: There are no pathway or release controls instituted at this time.
- Surface Water: There are no pathway or release controls instituted at this time.
- Soil: There are no pathway or release controls instituted at this time.

E. Observations made during visual inspection

EPA or State permitted activities

- Aboveground Storage Tanks Mineral Spirits: Aboveground storage tanks containing
 mineral spirits are located outside of the southeast corner of the building (see Figure 2 and
 Picture 6). The tanks have secondary containment (concrete pit) and all piping is doublewalled.
- Aboveground Storage Tanks Paraffin: Three heated aboveground storage tanks containing liquid paraffin are located outside of the southeast corner of the building. Refer to Figure 2 and Picture 7. There is no secondary containment. In the event of a release of liquid paraffin, the paraffin would solidify, preventing it from contaminating groundwater, surface water and air. Soil would be affected, however, the soil could be easily removed.
- <u>Underground Storage Tank:</u> Located at the facility is a 10,000 gallon UST containing fuel oil. The tank was installed in 1995 and according to Mr. Mellinger the tank meets the technical requirement (i.e., leak detection, double walled, etc.) for a UST.

Areas requiring periodic inspection

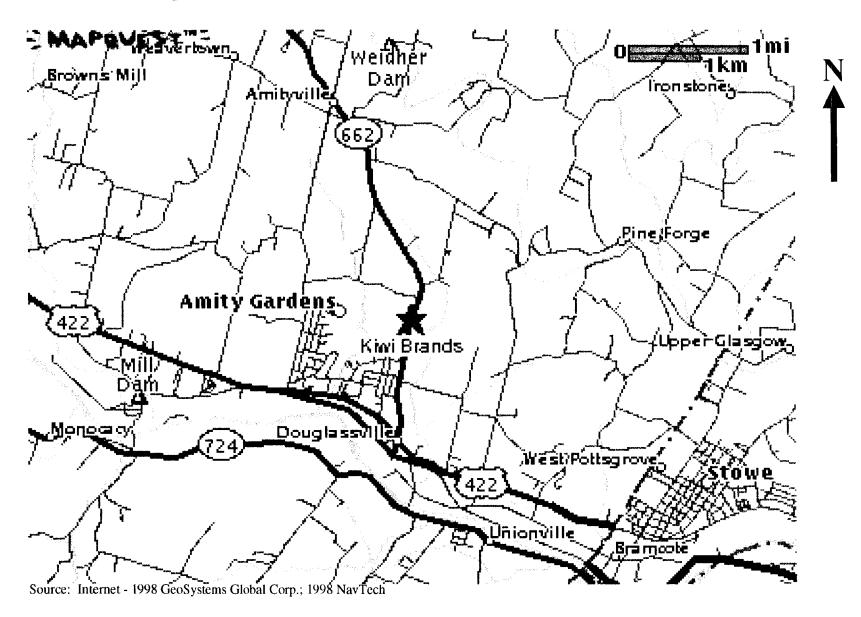
• Other than the required Hazardous Waste Inspection as required by RCRA, there are no additional areas requiring periodic inspection.

F. Follow-up action items

No follow-up action items recommended at this time.

Attachment 1 Figures

Figure 1 - Site Location Map, Kiwi Brands



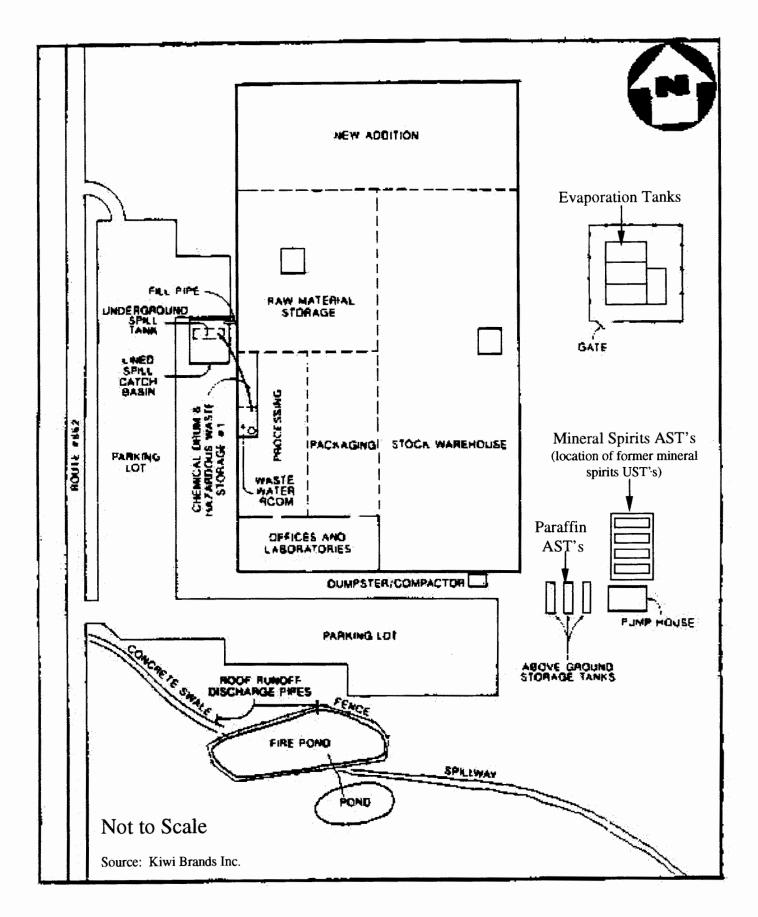


Figure 2 - Site Map, Kiwi Brands

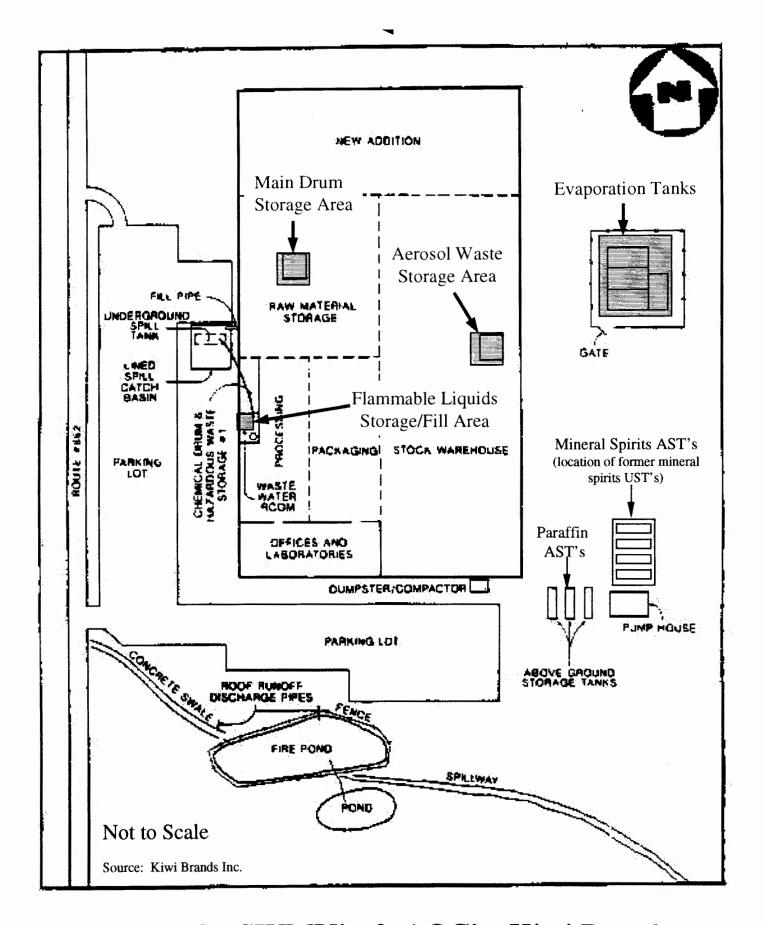


Figure 3 - SWMU's & AOC's, Kiwi Brands

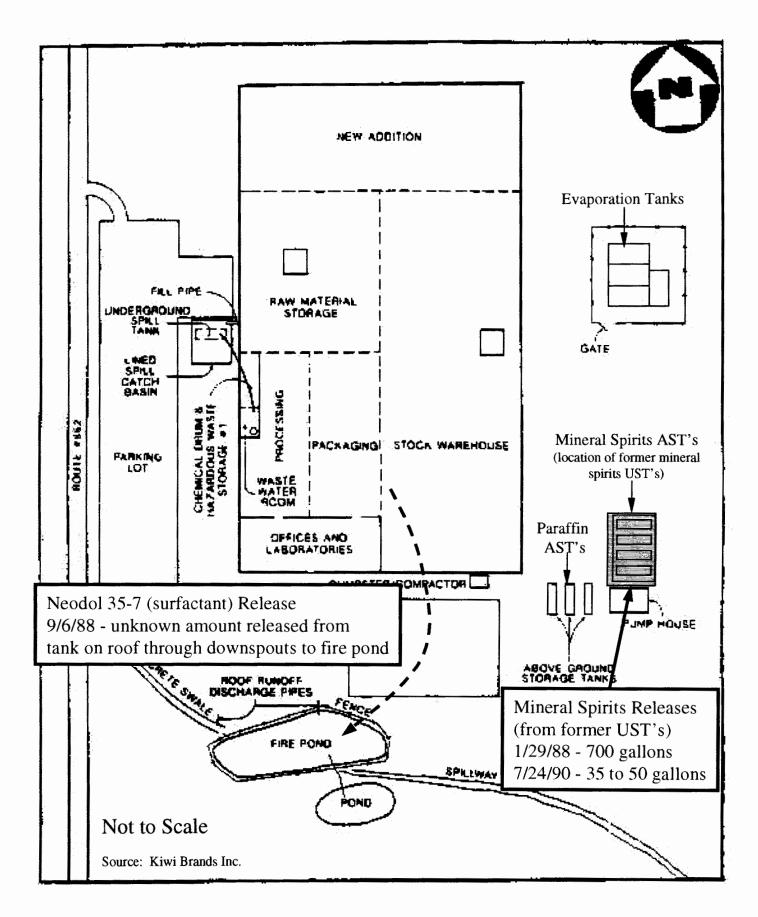
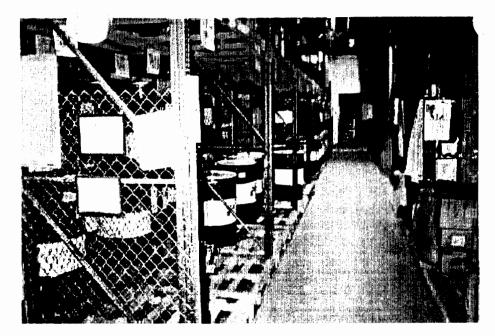


Figure 4 - Past Releases, Kiwi Brands

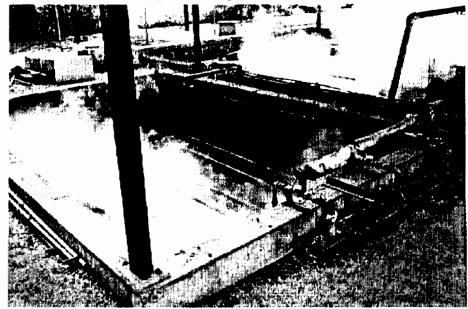
Attachment 2 Pictures

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Picture 1 - Main Drum Storage Area (Hazardous & Non-hazardous Waste)

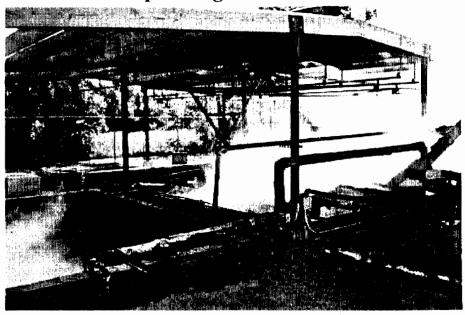


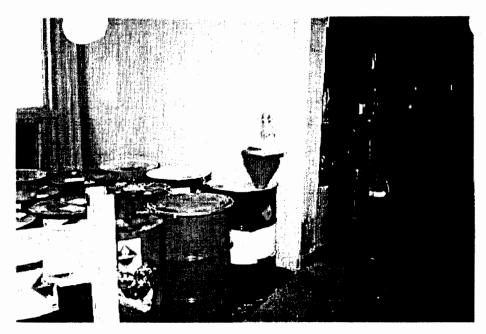




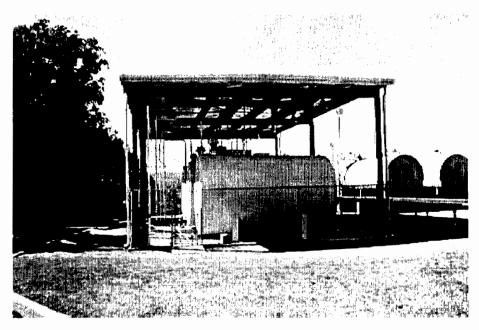
Picture 2 - Aerosol Waste Collection & Storage Area

Picture 4 - Evaporating Unit



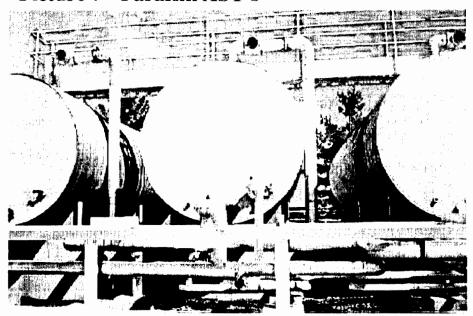


Picture 5 - Flammable Liquids Fill/Storage Area



Picture 6 - Mineral Spirits AST's

Picture 7 - Paraffin AST's



Appendix A

Correspondences and Analytical Data Documenting Closures of Spills and Releases

Table of Contents

Appendix A Correspondences and Analytical Data Documenting Closures of Spills and Releases

- Correspondences between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated June 10, 1988 and February 12, 1988: Subject: 700 gallon mineral spirits spill.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated September 20, 1989
 Subject: Analytical results from three recovery wells in support of the 700 gallon mineral spirits release.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated October 10, 1989
 Subject: Closure letter for the Neodol 25-7 release.
- Correspondence between Kiwi Brands, Inc and USEPA dated December 1, 1997
 Subject: Waste Management Documentation
- Analytical Report from SSM Laboratories to Kiwi Brands, Inc. dated February 10, 1992

Subject: Mineral Spirit Wells Groundwater Data.

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 PHONE: (215) 385-3041 CABLES: KIWI DOUGLASSVILLE TELEX: 846384 FAX: (215) 385-6177

10 June 1988

Mr. Michael Maiolie
Waste Management Specialist
PENNSYLVANIA DEPARTMENT OF ENV. RESOURCES
625 Cherry St.
Reading, PA 19602

Dear Mr. Maiolie:

On 29 January 1988, during a 7000 gallon bulk delivery of mineral spirits, a faulty tank level indicator caused an underground storage tank overfill. As a result of this incident, approximately 700 gallons mineral spirits spilled onto the ground. Cleanup actions were immediately undertaken. This included collection of any recoverable mineral spirits, excavation of approximately 120 tons of contaminated soil, and installation of three recovery wells.

Water collected from the recovery wells has been passed through a 400 gallon decanting tank. Any supernatant present was collected for off-site disposal. In addition, absorbent pads were used to remove any mineral spirits that appeared as a surface sheen on the tank. Collection of ground water in the recovery wells is still ongoing.

As background information, we have attached a copy of the letter dated 12 February 1988 which details the incident and the measures which have been taken to correct the problem.

As the next step toward returning our plant to the conditions which existed before this incident, backfilling and reseeding of the excavated areas need to be accomplished. During the initial cleanup actions, approximately 100 tons of gravel were used as backfill for the area surrounding these recovery wells. In order to restore the landscape, it will be necessary to finish backfilling the excavated area with soil and reseed.

The backfilling and reseeding operations should have no significant effect on the continuing ground water collection efforts. We expect to accomplish this task by 30 June 1988.

I hope this letter serves to update you on the status of our cleanup efforts. If you have any questions, I may be contacted at 215/385-3041.

Sincerely,

FIKS

EDWARD R. STRAUCH, JR. Analytical Affairs

CW

Att.

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 - PHONE: (215) 385-3041 - CABLES: KIWI DOUGLASSVILLE + TELEX: 846384 - FAX: (215) 385-6177

12 February 1988

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Mr. Fred Osman
Emergency Response Coordinator
Deputy Secretary's Office for Environmental Protection
Department of Environmental Resources
P. O. Box 2063
Harrisburg, Pennsylvania 17120

Dear Mr. Osman:

Please find enclosed a report of a mineral spirits spill which occurred at Kiwi Brands Inc., Douglassville, PA, January 29, 1988.

This is a written follow-up report complementing the verbal report made to the DER on January 29 with subsequent discussions on January 30, and February 9. In addition to the hazardous wast ϵ spill report, the following materials are included:

- A geographical map.
- A report on tank integrity testing, Hunter Laboratories.
- Witco material safety data sheet on mineral spirits.

If you have any questions concerning this report, please contact me.

Yours truly,

Peter A. Burke, Ph.D.

Director Research & Development

js

cc:

M. Maiolie, PA Department of Environmental Resources

E. Trousdell, National Response Center

bcc:

J. Judd

E. L. Collier

G. T. Kilishek

E. R. Strauch

HAZARDOUS WASTE SPILL REPORT

Name: Kiwi Brands Inc.

Address: Route 662 North

Douglassville, PA 19518

EPA ID No.: PAD097153399

Incident Date: 39 January 1988

Incident Time: Approximately 10:00 a.m.

Incident Location: Mineral spirits underground storage tank #3

located on Kiwi facility (see attached diagram,

Page 6 of Kiwi PPC Plan)

Description of Incident:

A 7000 gallon bulk delivery of mineral spirits solvent was being unloaded into a 10,000 gallon underground mineral spirits tank #3. Due to a faulty manometer on Tank #3, which indicated 1400 gallons volume prior to unloading, this tank was overfilled; mineral spirits poured out of the vent pipe onto the ground.

Remedial Action Taken:

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- The snow on the ground in the vicinity of the vent pipe was shoveled into drums.
- 2. Free mineral spirits on the surface was soaked up with absorbent and placed into drums.
- 3. Containment booms were placed around the perimeter of the underground storage tank area.
- 4. J & J Spill Service arranged for excavation of soil.
 Approximately two-three feet deep mineral spirits pools
 were observed. The spirits was absorbed with
 polypropylene booms and pads, which were placed in drums.
- 5. Mineral spirits was also found inside concrete access vaults which set upon top of tanks. Spirits level was 3-12 inches in tank vaults #1, #2, and #3; none in #4 and #5. This spirits was manually removed into drums.

- 6. Excavation was continued with approximately one hundred tons of soil total removed and placed on plastic film covered asphalt. The soil piles were covered with a plastic shroud and connected booms placed around perimeter. A recovery well was positioned between tanks #1 and #2, extending down to the concrete pad. A second recovery well was placed between Tank #1 and the pumphouse. A third recovery well was placed between Tanks #2 and #3. Gravel was backfilled around the wells up to the top of the tanks. During well placement, a vacuum truck removed approximately 1000 gallons of water and minimal mineral spirits. A closed cup flash test indicated non-hazardous (>200°F). This was placed into our waste water evaporator tanks.
- 7. A mineral spirits separator system was constructed to pump water from each recovery well into a 400 gallon decanting tank. The well water is pumped into the decanting tank and allowed to separate for thirty minutes. Any supernatant spirits is decanted from the tank, then the water is pumped to our waste water evaporator tanks. Thus far, we have passed about 20,000 gallons of water through the decanting tank, and there is a minimal sheen of mineral spirits upon the surface of the water inside the tank, which is blotted with spirits-absorbent pads. The system will remain in operation until samples of the surface liquid inside the decanting tank are free of mineral spirits when analyzed by an independent testing laboratory.

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- 8. All tanks were pressure-tested (to 5 psi) by Kiwi personnel on 30 January 1988/31 January 1988 and found to be tight.
- 9. Hunter Environmental Services performed tank integrity testing on all five tanks on 5 February 1988 and 8 February 1988, and all passed testing (copy of preliminary test results attached).
- 10. A french drain was inspected, which is located at the tank top level and extending from the vicinity of Tank #1 toward the east boundary of our facility. The soil near the end of the drain was excavated, and no spirits contamination was found. This drain is considered to be the most likely egress of spirits from the underground tank area.
- 11. An earthen dam is in place around both the tank farm and the contaminated soil piles to contain any possible run-off water containing spirits. This run-off would be diverted back to the underground tank area where the mineral spirits separator system is in place.

Estimate of Recovered Mineral Spirits:

Contaminated snow	Minimal	Placed in evaporato tanks as per directive of M. Maiolie (DER) on 29 Jan 88.
Absorbent pads/booms/granules	250-300 gal	To be sent to approved landfill.
Contaminated soil		To be sent to approved landfill.
Removed from concrete vaults	350 gal	Send to waste processing facility for use in fuel recovery program.

Approx. 700 gal

Preventive Measures To Be Taken:

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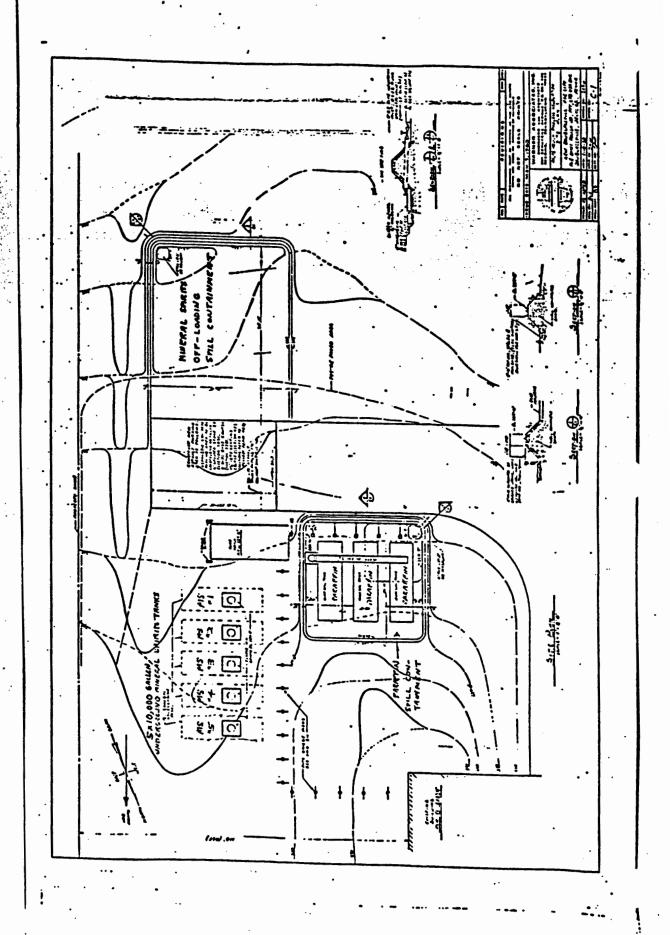
- 1. Prior to unloading future deliveries, the current underground tank contents will be verified by manual sticking the tank to insure adequate space to fit the delivery.
- 2. We are in the process of returning the manometers on all five tanks to the manufacturer for repair and calibration.
- 3. We are investigating the purchase of the following equipment:
 - a. Overfill protection device
 - b. In-tank product level sensors

Contacts with government agencies:

- 1. Contacted DER (Mr. Osman) 11:00 to 11:45 a.m. on 29 Jan 88.
- Contacted Emergency Response Center 11:00 to 11:45 a.m. on 29 Jan 88.
- 3. Visit to site by M. Maiolie of PA DER 2:00 p.m. on 29 Jan 88.
- 4. Recontacted DER (Wayne Levy) 5:00 p.m. on 30 Jan 88.
- 5. DER inspectors (M. Maiolie and Kyle Schmeck) visited site 1:00 p.m. on 9 Feb 88.

ERS/ep: 2/12/88

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ENVIRONMENTAL SERVICES, INC.

D Canton, OH (216) 453-1800 XXPhiladelphia, PA (215) 296-7380

□ Los Angeles, CA (714) 962-7203

Dallas, TX (214) 373-0888

2-5-88 DATE

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TECHNICAL REVIEW ___

PRELIMINARY TEST REPORT

© Canton, OH (216) 453-1800

Philadelphia, PA (215) 296-7380

D Los Angeles, CA (714) 962-7203 D Dallas, TX (214) 373-0888

DATE _____2-8-88

CONTACT: Ed Straka 215-385-97

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KENSOL 30

PAGE 1

Product Code: CO4 4111



4 - Extreme

· F 3 - High

2 - Moderate

1 - Slight

0 - Insignificant

Toxicity



Reactiv

8052-41-3

Special

100

DIVISION AND LOCATION --- SECTION I

Division: KENDALL/AMALIE

Location: BRADFORD, PENNSYL NIA

77 N. KENDALL AVE. BRADFORD, PA, 16701

Emergency Telephone Number: (814) 368-6111

Transportation Emergency: CHEM TREC 1-(800) 424-9300 (U.S. and Canada)

CHEMICAL AND PHYSICAL PROPERTIES---SECTION II

Chemical Name:

petroleum hydrocarbon

Pormula: not applicable

Hazardous Decomposition Products:
carbon monoxide and carbon dioxide from burning.

Incompatibility (Reep away from):
strong oxidizers such as hydrogen peroxide, bromine, and chromic acid.

Toxic and Hazardous Ingredients:

Stoddard solvent Odor: mild petroleum Form: liquid

Appearanca: low viscosity liquid Color: colorless

Specific Gravity (water-1): .77

Boiling Point: greater than 154°C (310°F)

Melting Point: not applicable

Solubility in Water (by weight 3): 0 at 20°C

Volatile (by weight 3): 100

Evaporation Rate: (n butyl acetate = 1) .2

Vapor Prassure (mm Hg at 20°C): 3

Yapor Density (air=1): 4.85

pH (as is): not applicable

*

Stability: Product is stable under normal conditions

Viscosity SUS at 100°F: Less than 100

FIRE AND EXPLOSION DATA---- SECTION III

Special Fire Fighting Procedures:

Do not use water except as fog

Unusual Fire and Explosion Hazards:

Avoid all ignition sources such as flames and sparks Zlashpoint: (Method Used) Tag closed-cup 38°C (101°F)

(Continued on next page)

KENSOL 30

Product Code: CO4 4111

(Section III continued)

Plammable limits %:

Lower: 1 Upper: 7

Extinguishing agents:

Drychemical or Waterfog or CO2 or Foam Exposed material may be cooled with water.

HEALTH HAZARD DATA---SECTION IV

Permissible concentrations (air):

stoddard solvent: 500 ppm (OSHA); 100 ppm (ACGIH); STEL 200 ppm (ACGIH)

Chronic effects of overexposure:

Irritation of eyes, nose and throat. Dizziness. Dermatitis.

Acute toxicological properties:

no data available

Emergency First Aid Procedures:

Immediately flush with large quantities of water for at least 15 Eves:

minutes and call a physician.

Skin Contact: Remove excess with cloth or paper. Wash thoroughly with soap :

water.

Inhalation:

Remove victim to fresh air. Call a physician.

If Swallowed: Call a physician immediately. DO NOT induce vomiting. (Vomitir may cause aspiration into lungs resulting in chemical

pneumonia.)

This statement is required under federal regulations for consumer products. Although this product is intended for industrial use, the statement is included because of the

possibility of consumer use.

SPECIAL PROTECTION INFORMATION---SECTION V

Ventilation Type Required (Local.mechanical.special):

Local if necessary to maintain allowable PEL(permissible exposure limit) or TLY(threshhold limit value)

Respiratory Protection (Specify type):

Use NIOSH/OSHA approved respirator with organic vapor cartridge if vapor

concentration exceeds permissible exposure limit

Protective Gloves: neoprene type

Eve Protection: chemical safety goggles.

Other Protective Equipment:

none

HANDLING OF SPILLS OR LEAKS---SECTION VI

Procedures for Clean-UD:

Avoid all ignition sources such as flames and sparks. Insure good ventilation. If volume is significant, transfer into containers for disposal. Seal container KENSOL 30

Product Code: CO4 4111

(Section VI continued)

tightly. Absorb on an inert ingredient such as earth, sand or vermiculite. Sweep up and dispose of according to Federal, State and local regulations.

*aste Disposal:

Dispose of in accordance with all applicable federal, state and local regulations.

PECIAL PRECAUTIONS---SECTION VII

Avoid all ignition sources such as flames and sparks.

Do not handle or store at temperatures over
[aximum Storage Temperature: 38°C (100°F)

, =

TRANSPORTATION DATA---SECTION VIII

).O.T.: Regulated

I.S. D.O.T. Proper Shipping Name: Petroleum naphtha

I.S. D.O.T. Hazard Class: Combustible liquid

.D. Number: UN 1255

bel(s) Required: none

portable Quantity: none

raight Classification: Petroleum Naphtha-Combustible Liquid

pecial Transportation Notes:

Unregulated by DOT when shipped in containers of less than 110 gallons.

Y1111

COMMENTS--- SECTION IX

<u> </u>	140 - 47	•	
litle:			
MGR., NEW PRODUCTS			
riginal Date: 06/03/80		Date:	
evision Data: 04/24/86	 		
'upersedes: 10/03/83			

e believe the statements, technical information and recommendations contained herein re reliable, but they are given without warranty or guarantee of any kind, express r implied, and we assume no responsibility for any loss, damage, or expense, direct r consequential, arising out of their use.

RT. 662, DOUGLASSYILLE, PA 19518 • PHONE: (215) 385-3041 • FAX: (215) 385-6177 • TELEX: 846384

20 September 1989

Michael Maiolie Waste Management Specialist PENNSYLVANIA DEPARTMENT OF ENV. RESOURCES 625 Cherry St. Reading, Pa. 19606

Dear Mike:

I am forwarding to you the results of the recovery well testing at Kiwi Brands Inc. We had an overfill during a delivery of mineral spirits into our underground tank #3 on 29 January 1988. As a result, approximately 700 gallons mineral spirits spilled onto the ground. Remedial action included collection of any recoverable mineral spirits, excavation of approximately 120 tons of contaminated soil, and installation of three recovery wells to the depth of the bottom of the storage tanks. The incident report dated 12 February 1988, which we sent to you, fully describes our response activities.

Initially, water collected from the recovery wells was passed through a 400 gallon decanting tank to collect supernatant solvent. This was performed regularly for the first three months until no observable supernatant solvent was being removed. Henceforth, we would pump water from each of the wells into our wastewater system to remove residual solvent.

Well testing was performed every six months to monitor the residual solvent level. To prepare for the well testing, standing water was removed from each well by pumping for one-half hour at 35 gpm or until the wells were emptied. A representative of RMC Environmental Labs would sample each well. As we agreed to do, the total petroleum hydrocarbon level was analyzed by method 418.1.

The test results were as follows:

Department of Environmental Resources

Reading District Office 625 Cherry street Reading, PA 19802 215-378-4175

October 10, 1989

Mr. David Cusumano Kiwi Brands Incorporated Route 662 Douglassville, PA 19518

> Ne: Neodol 25-7 Spill Remediation Amity Township, Berks County

Dear Hr. Cusumano:

This letter is in response to your letter of July 25, 1989 and the follow-up meeting held at Kiwi Brands on September 25, 1989. Riwi has demonstrated to the Department's satisfaction that the neodol 25-7 spill has been sufficiently remediated through the temporary storage of affected point slunge and biodegradation of the neodol 25-7.

Therefore the Department grants approval to kiwi to empty and dismantle the temporary pond sludge holding area as discussed at our meeting. Fresion of the disturbed areas should be controlled until vegetation can be established.

If you have any questions please feel free to contactd we at 215-obl-2070 of 215-376-4175.

Very truly yours,

MICHAEL FAIOLIE
Field Operations Supervisor

cc: Norristown Regional File Reading District File V Mr. Zwalinski Re30 Tho.1



447 OLD SWEDE ROAD, DOUGLASSVILLE, PA 19518-1239 • PHONE: (610) 385-3041 • FAX: (610) 385-6177

1 December 1997

Mr. Kevin Boyd U. S. Environmental Protection Agency Region III 841 Chestnut Building - 3HW80 Philadelphia, PA 19107-4431

RE: WASTE MANAGEMENT DOCUMENTATION

Dear Mr. Boyd:

As requested by you during your visit to our facilities on 18 November 1997, I have enclosed a copy of the following documents:

- PADEP Hazardous Waste Inspection Report Generators dated 12 June 1997 by S.
 Werner, PADEP
- Letter dated 29 August 1995 to W. Noll, PADEP, from M. Mellinger, Kiwi Brands, regarding groundwater sampling results in reference to the removal of our mineral spirits UST's
- Letter dated 23 November 1994 to S. Kinkaid, PADER, from M. Mellinger, Kiwi Brands, regarding the disposal of mineral spirits' contaminated soil from a mineral spirits release on 13 September 1994
 - Letter dated 7 April 1992 to K. Leib, PADER, from D. Cusumano, Kiwi Brands, regarding groundwater sampling results in reference to a mineral spirits release on 24 July 1990
- Letter dated 17 January 1990 to P. Burke, Kiwi Brands, from R. Cook, PADER, regarding the successful remediation of a Neodol 25-7 release on 6 September 1988

- Letter dated 10 October 1989 to D. Cusumano, Kiwi Brands, from M. Maiolie, PADER, regarding the successful remediation of a Neodol 25-7 release on 6 September 1988
- Letter dated 20 September 1989 to M. Maiolie, PADER, from E. Strauch, Kiwi Brands, regarding groundwater sampling results in reference to a mineral spirits release on 29 January 1988
- Memo dated 4 May 1987 to P. Burke, Kiwi Brands, from E. Strauch, Kiwi Brands, documenting a telephone conversation with M. Maiolie, PADER, regarding the closure of our evaporator tanks (RCRA hazardous waste collection system)
- Letter dated 18 September 1986 to M. Maiolie, PADER, from E. Strauch, Kiwi Brands, regarding the closure of our evaporator tanks (RCRA hazardous waste collection system)
- Letter dated 10 September 1986 to P. Burke, Kiwi Brands, from M. Maiolie, PADER, regarding the closure of our evaporator tanks (RCRA hazardous waste collection system)

I understand that this information will be added to our RCRIS file along with your inspection report.

If you need additional information or have any questions, please contact me at 610-385-9246.

Cordially,

Michael V. Mellinger, Ph.D., REM

Environmental Affairs Manager

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

RECEIVED

JUN 1 9 1997

0011 2 0 1007

	<u> </u>			KIWI BRAND				
Date of Inspection	,	ime start	Time finish					
Name of Inspector Susan M. Wener Company, installation name Kiwi Brands Inc.								
	1 🔺							
	old Swede R							
V			Amity Twp					
_	PAD 097153							
_	ficial <u>Mike He</u> l	•		Mage.				
Title E	iviron mental Affi	airs Manager						
Mailing Address	147 old Swede 1	Road Doug	lassville PA 1	9518-1239				
Area code and telephor	ne number 610	385 3041		· · · · · · · · · · · · · · · · · · ·				
	ewed Mike	V	· ····································					
Title	Environn	vental Affair	rs Manager	····				
Mailing address (if diffe	rent from above)							
Area code and telephor	e number	Same	***************************************					
Current waste han	dlina method:	,						
a. On-site	treatment,	storage,	disposal	☐ PBR				
b. 🗆 On-site	□ use,	reuse,	recycle,	☐ reclaim				
c. 🖾 Off-site		storage,	☑ disposal	G				
d. ☐ Off-site	use,	reuse,	recycle,	☐ reclaim				
-		_	_ ,	_				
	ous waste produced:	t (
a. <u>513</u> °		kg./mo.						
b. <u>6164</u>	217	kg./yr.						
-· / / ·	us waste produced by .	Hazardous Waste !	Number and destinati	on facility (include				
location and type).	•							
Waste Number	Destination I	Facility	Location ar	nd Type				
DOOL . DOOK, DOOT . DOIS	ENSCO GAD DO	0222083	Dalton GA 1	Disposal, Blending				
F003 F005 U216								
1003 P003 048 B								
4. Source Reduction:	🛛 accomplished, 🎢 pro	posed, \square not propo	osed					

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name	Kiw:	Brands	Inc.	ID Number	PAD 097 153399	_ Date	06-12-97
-----------	------	--------	------	-----------	----------------	--------	----------

Hazardous Waste Inspection Report Generators - Part B

	STATUS		5	OEO(HOEMEN):	CHAPTER	LINE
1	2	3	4	REQUIREMENT.	CITATION	ITEM
1				Hazardous waste determination, performed on all waste streams	262 11	H00
1				Identification number	262.1.	H00
l				Hazardous waste shipments offered only to licensed transporters	262.1∠(d)	H00:
	2			Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
	2			PA manifest used for intrastate shipments	262.20(b)	H005
1				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
1				Manifests filled out properly and completely	262.20(g)	H007
1				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
		3		Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
-		3		Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
١				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
١				Placards offered to transporter	262.33	H012
1				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
1				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
1				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
١				a). All containers of haz. waste in good condition	265.171	H016
1				b). Containers compatible with hazardous waste being stored within	265.172	H017
1				c). Containers of hazardous waste kept closed	265.173(a)	H018
1				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
١				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
1				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
١				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176177	H022
_				h). Proper containment and collection system(s)	265.178	H023
١				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
Ť				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

Hazardous Waste Inspection Report Generators - Part B 2-Not-Applicable 3-Not-Determine

			1-	No Violation Observed 2-Not-Applicable 3-Not-Determined	4-Non-Compliance		
1	STA 2	TU:	5	REQUIREMENT	CHAPTER CITATION	LINE	
_	T			Records retained at designated location for 20 years	262.40(a)	HU.	
	2			Quarterly reports submitted to the Department	262.41(a)	H027	
١				Exception reporting procedures followed	262.42	H028	
	2			Hazardous waste disposal plan, if required	262.45	H029	
١				Spill reporting procedures followed	262.46(a)	H030	
1				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031	
	2			Special requirements followed for international shipments	262.50,.53, .55, .60	H032	
ī				Source reduction strategy prepared and available	262.80	H033	

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: June 12, 1997

Identification Number: PAD097153399

Company/Facility/Site Name: Kiwi Brands, Inc.

I arrived on-site and met with Mr. Mike Mellinger. We proceeded on an inspection of the hazardous and residual waste generation and storage areas.

38 drums of hazardous waste and 29 drums of residual waste were observed in the main drum storage area. This area has been upgraded since the last inspection. During the last inspection, cracks were observed in the floor near the drums. Since then, the cracks have been filled and the floor painted with a sealant. Steel sealed curbing has been installed all around the storage area with soft dikes at the access points for tow motors to get in and out.

All the drums in the storage area were properly labelled and all labels were visible for inspection.

There were 8 drums of hazardous waste in the aerosol waste storage area. These drums were also properly labelled and visible.

The facility has three pits behind the building which are used to evaporate liquid waste from the production lines. This waste is non-hazardous and the sludge is removed to ENSCO in GA.

The facility also has a compactor dumpster for the plant trash. This dumpster is taken to Pottstown Landfill as a residual waste.

The facility is now placing all hazardous wastes into drums which are painted black with a white stripe around the middle. This is so these drums can be easily identified.

3 full drums of flammable waste were observed in the flammables room and 1 partial drum being filled. All the drums were closed and properly labelled.

After completing the inspection of the facility, we returned to the office to review the records.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

	٠,		\prime		1		,			
erson Interviewed (Signature)	. 4	00	7			1000	<i>-</i> 0.		6-19-97	
erson Interviewed (Signature)/V/	110	W	_	10/0	ve	wing		Date	Q 1 (1)	
Inspector (Signature)	77.	21	ير	wz				Date	6-19-97	

Page 4 of 5

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This Inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: June 12, 1997

Identification Number: PAD097153399

Company/Facility/Site Name: Kiwi Brands, Inc.

Hazardous Waste Biennial Report

The 1996 Biennial Report contains information about wastes generated in 1995. During 1995, the facility generated 136232 pounds of hazardous waste or 61643.4 kilograms. This works out to 5136.9 kilograms per month making the facility a large quantity generator.

Storage Area Inspection Logs

The storage areas are inspected on a daily basis and the log is filled out once a week. These logs were reviewed for the period of January 1997 to present.

Preparedness, Prevention, and Contingency Plan

This plan was updated on January of 1997 and includes all personnel changes.

Source Reduction Strategies

The SRS were written in 1992 and 1994. The facility is planning to update them after July 1, 1997.

Manifests

Manifests were reviewed for the period of January 1997 to present. During this period all waste shipped where en to ENSCO in GA.

மmployee Training

Employee training was conducted in December of 1996 and is planned again in December of 1997. All employees who handle hazardous wastes were trained.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

on Interviewed (Signature)	dal Mel	luger Date	6-19-97	
Inspector (Signature)	M. Wenn	Date _	6-19-97	

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447 OLD SWEDE ROAD, DOUGLASSVILLE, PA 19518-1239 • PHONE (610) 385-3041 • FAX (610) 385-6177

29 August 1995

Mr. F. William Noll
PA Dept of Environmental Protection
Southcentral Regional Office
One Ararat Boulevard
Harrisburg, PA 17110

RE: UST 06-12106 Tanks 001 - 006 Removal GW Analyses

Dear Mr. Noll:

As we had previously discussed on 20 March 1995 Kiwi Brands (KB) agreed to collect and analyze groundwater from an onsite well during the summer of 1995 to investigate the presence of petroleum hydrocarbon contaminants relative to our UST mineral spirits removal project conducted in late 1993. We conducted the sampling on 2 August 1995. The well depth is 300 feet, the water level is approximately 60 feet, and the pump used to collect the sample is set at 190 feet. The analytical report is attached. Levels for all analytes is below detection limits in every case.

KB suggests that these results substantiate our conclusion that the groundwater was not contaminated as a result of the mineral spirits tanks removal. At this time we do not plan to conduct any additional sampling efforts. We would appreciate your adding this information to our file in your office so that the case can be closed. We will assume this action has been done unless notified to the contrary.

Thank you for your attention to this matter.

Sincerely.

Michael V. Mellinger, Ph.D., REM

Environmental Affairs Manager



HECEIVED

AUG 11 1995

KIWI BRANDS, INC. ENVIRONMENTAL AFFAIRS

L-954109

ANALYTICAL REPORT

CLIENT: Kiwi Brands, Inc.

447 Old Swede Road

Douglassville PA 19518

SAMPLE ID:

Well

SAMPLING DATE: 08-02-95

TIME: 08:05 BY: MJO

REPORTED: 08-08-95

RECEIVED: 08-02-95

WORK ORDER: L-954109

REPORT TO: Mr. Mike Mellinger

SITE LOCATION: Douglassville, PA Plant

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ANALYSIS	METHOD	UNIT	RESULT	DATE/INITIAL
1,1-Dichloroethane	601	ug/Lppb<	5	08-02-95/KLG
1,1,1-Trichloroethane	601	ug/L' <	5	08-02-95/KLG
1,1,2-Trichloroethane	601	ug/L <	5	08-02-95/KLG
1,1,2,2-Tetrachloroethane	601	ug/L <	5	08-02-95/KLG
1,2-Dichlorobenzene	601	ug/L <	5	08-02-95/KLG
1 ?-Dichloroethane	601	ug/L <	5 5	08-02-95/F
Dichloropropane	601	ug/L <	5	08-02-95/1
-Dichlorobenzene	601	ug/L <	5	08-02-95/KLG
1,4-Dichlorobenzene	601	ug/L <	5	08-02-95/KLG
2-Chloroethyl Vinyl ether	601	ug/L <	10	08-02-95/KLG
Benzene	602	ug/L <	5	08-02-95/KLG
Bromodichloromethane	601	ug/L <	5	08-02-95/KLG
Bromoform	601	ug/L <	5	08-02-95/KLG
Bromomethane	601	ug/L <	5 5	08-02-95/KLG
Carbon Tetrachloride	601	ug/L <		08-02-95/KLG
Chlorobenzene	601	ug/L <	5	08-02-95/KLG
Chloroethane	601	ug/L <	5	08-02-95/KLG
Chloroform	601	ug/L <	5	08-02-95/KLG
Chloromethane	601	ug/L <	5 5	08-02-95/KLG
Dibromochloromethane	601	ug/L <	5	08-02-95/KLG
Ethylbenzene	602	ug/L <	5	08-02-95/KLG
Methylene Chloride	601	ug/L <	5 5 5	08-02-95/KLG
Tetrachloroethene	601	ug/L <	5	08-02-95/KLG
Toluene	602	ug/L <		08-02-95/KLG
Trichloroethene	601	ug/L <	5	08-02-95/KLG
Trichlorofluoromethane	601	ug/L <	5	08-02-95/KLG
Vinyl Chloride	601	ug/L <	5	08-02-95/KLG
Xylenes, Total	602***		15	08-02-95/KLG
cis-1,3-Dichloropropene	601	ug/L <	5	08-02-95/KLG
trans-1,2-Dichloroethene	601	ug/L <	5	08-02-95/KLG
trans-1,3-Dichloropropene	601	ug/L <	5	08-02-95/KIC

ANALYSIS METHOD UNIT RESULT DATE/INITIAL TPH-Diesel Range Organics 8015** mg/L < 1 08-08-98/JLW TPH-Gasoline Range Organics 8015* mg/L < 1.0 08-03-95/KLG

***Modified

**API Method - Solvent Extraction

* API Method - Purge & Trap

Reviewed_by:

Waren L. Merrill Laboratory Director



447 OLD SWEDE ROAD, DOUGLASSVILLE, PA 19518-1239 + PHONE; (610) 385-3041 + FAX; (610) 385-6177

November 23, 1994

Ms. Susan M. Kinkaid Pennsylvania Department of Environmental Resources Waste Management Program 1005 Cross Roads Boulevard Reading, PA 19605

Re: Disposal of Contaminated Soil From Mineral Spirits Release - September 13,1994

Dear Ms. Kinkaid:

As requested during your site visit on 22 September 1994, attached is a copy of the "Certificate of Soil Remediation" from Soil Remediation of Philadelphia, Inc. confirming that the soil was properly disposed.

If you need additional information, please contact me at (610)385-9246.

Sincerely,

Michael V. Mellinger, Ph.D.

Environmental Affairs Manager

Enclosure: Certificate (copy)

MVM:llh

SOIL REMEDIATION of Philadelphia, Inc.

3201 South 61st Street
Philadelphia, PA 19153
Pennsylvania Department of Environmental Resources Permitted Facility

CERTIFICATE OF SOIL REMEDIATION

Soil Remediation of Phi	ludelphia, Inc., certilies	that <u>36-60</u> tons of no	on-hazardous petrolet	JW
contaminated soil delive	ered by allum form	ionmental	and identified t	අප
Lot # 1489 has be				
has been remediated				
Department of Environment	e <mark>ntal Resources</mark> Clean	up Slandards issued (October 18, 1991. Th	ાંક
states that the hydrocar	bons are removed so	that they are non-dete	ectable thereby allowing	ıg
the soil to be consider	red clean fill.	·		
Certificate Issued To:	Kuwi Grand Sh	2 C.		
	Authorized Signature:	I and It	Distes	
•				
	Dale:	10-11-94		

447 OLD SWEDE ROAD, DOUGLASSVILLE, PA 19518-1239 • PHONE: (215) 385-3041 • FAX: (215) 385-6177 • TELEX: 846354

April 7, 1992

Mr. Kerry Leib

Department of Environmental Resources

Harrisburg Region

One Ararat Blvd.

Harrisburg, PA 17110

Dear Mr. Leib:

On July 27, 1990, Kiwi Brands Inc. submitted an initial report concerning a spill of 35 to 50 gallons of mineral spirits which occurred on July 24, 1990. Remedial action which was taken included purging the three recovery wells which are located by the spill area. Subsequently, well sampling was conducted and purging continued until well sampling indicated less than detectable levels of total petroleum hydrocarbons were present.

Attached are lab analyses which have been performed since the spill. These results indicate the levels of petroleum hydrocarbons have dropped to less than detectable levels. Kiwi Brands Inc. has now discontinued purging of the recovery wells.

Additionally, as part of the measures implemented to prevent future spills during tank truck unloading operations, **Kiwi Brands Inc.** has installed a tank overfill protection system. This system provides high level alarms and will automatically suspend pumping operations if the tank volume reaches 90% capacity.

I hope these actions satisfy the requirements of the Department of Environmental Resources concerning remediation of the mineral spirits spill which occurred on July 24, 1990.

Sincerely,

David J. Cusumano

Senior Environmental Chemist

David J. Cusumano

DJC:jt:A-06

Attachments

cc: P. A. Burke

E. R. Strauch



REQUEST FOR LABORATORY ANALYSIS GENERAL ENVIRONMENTAL

CLIENT NAME: KIWI BRANDS	LAB.REF.:
ADDRESS: RT. 662 & Old Swell Rds.	P.O.NO.:
Douglassville, PA 19518	
	DOC.NO.:
REQUESTED VERBAL TO	2/19/92
TIME LAB AF	
TEL.NO PRIORIT	TYES NO
SAMPLE TYPE: MINERALL SPIRIT WELL	IS GROWNAWAITER
SAMPLED BY: MTB DATE: 2	
SAMPLE I.D. SAMPLE DESCRIPTION	ANALYSIS REQUESTED .
CHAIN OF CUSTODY	•
CUSTODY RELINQUISHER BY: mulaul f. But ette	•
	5/92 TIME: 15:10
INTRALABORATORY TRANSFER CUSTODY RELINQUISHED BY:	
TO: DATE:	TIME:
DISPOSAL	
CUSTODY RELINQUISHED BY:	TIUE
TO: DATE:	IIMC:
COMMENTS:	
FORM No. LOSB REV. 6/91	



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Reading District Office 625 Cherry Street Reading, PA 19602 215-378-4175

January 17, 1990

Mr. Peter A. Burke, Director Research & Development Kiwi Brands, Inc. Route 662 North Douglassville, PA 19518



Re: Pollution Incident Kiwi Brands-Neodol 25-7 Spill

Amity Township, Berks County

Dear Mr. Burke:

This shall serve to acknowledge an incident which occurred at your facility on September 6, 1988, which threatened an unnamed tributary to the Schuylkill River. Briefly, a spill occurred during the unloading of product raw material which was discharged to a fire pond.

Due to immediate action by your Company, the material was prevented from ever reaching the nearby stream. More thoughtful and resourceful action was required to completely neutralize the spill and entirely mitigate the potential threat. This was done.

I would like to take this opportunity to thank you and your staff for the cooperation and action in dealing with the potentially serious spill. Specifically, Mr. Edward A. Strauch, Jr. merits special commendation for his action, courtesy and assistance in abatement.

The Department of Environmental Resources values industrial neighbors with the wherewithal and environmental conscience to effectively deal with emergencies. This is an enviable reflection of your Company presented to industry and the community that others would do well to emulate when the need arises.

Very truly yours,

PH W. COOK III

Water Quality Specialist

cc: Re30 RC16.2



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Reading District Office 625 Cherry Street Reading, PA 19602 215-378-4175

October 10, 1989

Mr. David Cusumano
Kiwi Brands Incorporated
Route 662*
Douglassville, PA 19518

RECEIVED TO DIRECTOR R&D

Re: Neodol 25-7 Spill Remediation Amity Township, Berks County

Dear Mr. Cusumano:

This letter is in response to your letter of July 25, 1989 and the follow-up meeting held at Kiwi Brands on September 25, 1989. Kiwi has demonstrated to the Department's satisfaction that the neodol 25-7 spill has been sufficiently remediated through the temporary storage of affected pond sludge and biodegradation of the neodol 25-7.

Therefore the Department grants approval to Kiwi to empty and dismantle the temporary pond sludge holding area as discussed at our meeting. Erosion of the disturbed areas should be controlled until vegetation can be established.

If you have any questions please feel free to contactd me at 215-861-2070 of 215-378-4175.

Very truly yours,

MICHAEL MAIOLIE

Field Operations Supervisor

cc: Norristown Regional File Reading District File

> Mr. Zwalinski Re30 MM6.1

Theme of Sender)

(Neme of Sender)

RT. 662, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • FAX: (215) 385-6177 • TELEX: 846384

SEP2 6 1989

20 September 1989

Michael Maiolie Waste Management Specialist PENNSYLVANIA DEPARTMENT OF ENV. RESOURCES 625 Cherry St. Reading, Pa. 19606

Dear Mike:

I am forwarding to you the results of the recovery well testing at Kiwi Brands Inc. We had an overfill during a delivery of mineral spirits into our underground tank #3 on 29 January 1988. As a result, approximately 700 gallons mineral spirits spilled onto the ground. Remedial action included collection of any recoverable mineral spirits, excavation of approximately 120 tons of contaminated soil, and installation of three recovery wells to the depth of the bottom of the storage tanks. The incident report dated 12 February 1988, which we sent to you, fully describes our response activities.

Initially, water collected from the recovery wells was passed through a 400 gallon decanting tank to collect supernatant solvent. This was performed regularly for the first three months until no observable supernatant solvent was being removed. Henceforth, we would pump water from each of the wells into our wastewater system to remove residual solvent.

Well testing was performed every six months to monitor the residual solvent level. To prepare for the well testing, standing water was removed from each well by pumping for one-half hour at 35 gpm or until the wells were emptied. A representative of RMC Environmental Labs would sample each well. As we agreed to do, the total petroleum hydrocarbon level was analyzed by method 418.1.

The test results were as follows:

- Dad also

Letter to Michael Mailolie Page 2 20 September 1989

Method 418.1 - Total Petroleum Hydrocarbon (MG/L) - PPM

Sample Date	Well #1	Well #2	Well #3
7/28/88	2.0	4.0	<1.8
12/29/88	<0.82	29.4 *	9.21 *
7/28/89	~ =	<0.87	<0.92

^{*} RMC Environmental Labs offered the following explanation for the elevated levels in these samples:

The levels of total petroleum hydrocarbons found in the most recent sampling of KIWI wells were higher than those reported in the past. It was noted by Richard Sichler, RMC's Senior Hydrogeologist, that the samples were extremely turbid from silt. It is possible that the elevated levels were caused by the extraction of hydrocarbons which had adhered to the silt particles. The reported values were higher because they included both the hydrocarbons dissolved in the water and the hydrocarbons which had adhered to the silt particles.

Since we have achieved the initial objectives for remedial action and monitoring, we would like to consider this project to be complete. Unless you feel otherwise, we do not plan any further activities with the recovery wells. They will, of course, remain in place and are kept capped at all times.

Please contact me at (215) 385-9241 should you have any questions. Sincerely,

ERS

Edward R. Strauch, Jr. Manager, Analytical & Environmental Affairs

/ljb

Encl.

KIWI BRANDS INC.



INTER-OFFICE MEMORANDUM

4 May 1987

From:

E.R. Strauch

To: PARABUTKE

SUBJECT: DISCUSSION WITH M. MAIOLIE (DER) RE EVAPORATOR TANK SLUDGE STATUS

As per my telephone conversation with M. Maiolie of the DE. on 28 April 1987, he considers administrative closure for the evaporator tanks to be complete. The does not plan to send a followup letter since his prior closure plan acceptance letter is sufficient along with the two certification forms we sent to him. He does not feel we need a permit for the sludge now classified as industrial residual waste unless we dispose of it in Pennsylvania.

Also, he has not read our revised PPC Plan yet but will get back to us after doing so.

EKS

EDWARD R. STRAUCH

ERS/ep

RECEIVED
MAY 5 1987
R&D

INC.

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 PHONE. (215) 385-3041 CABLES, KIWI DOUGLASSVILLE + TELEX 846384 + FAX. (215) 385-6177

18 September 1986

Mr. Michael Maiolie Waste Management Specialist DEPARTMENT OF ENVIRONMENTAL RESOURCES 625 Cherry Street Reading, PA 19602

Dear Mr. Maiolie:

We have received your letter of 10 September 1986 approving our closure plan for a collection tank, two evaporator tanks, and the overflow tank adjacent to the two evaporating tanks. Enclosed are the following completed closure certification forms:

- 1) Professional Engineer Certification of Closure
- 2) Owner or Operator Certification of Closure

With the completion of these forms, it is our understanding that the administrative closure for the units is now complete.

Very truly yours,

EDWARD R. STRAUCH, JR.

Senior Analytical Chemist

ERS/ep

Enclosures

PROFESSIONAL ENGINEER CERTIFICATION OF CLOSURE

I,	JOHN	JOSEP11	ORANSKY	, a Pi	rofessional Engineer registered
-		(N	ame)		-
purs	suant to th	e Profession	al Engineers Registr	ation Law,	63 P.S. \$\$148 <u>et seq</u> ., hereby
cer	tify that I	have review	ed the Closure Plan	for the	TORALE FACILITY at
	•		•		(Type of Facility)
	KINI	BRANDS	INC. azardous Waste Facil	•	("facility"), located
		(Name of He	zardous Waste Faci	lity)	
at	ROUTE	662 NEA	TH! DOUGLASS V	ILLE, PA.	19518
_			TH DOUGLASS V.	ion)	
tha	t I am fam	iliar with the	e rules and regulatio	ns of the P	ennsylvania Department of
					cility, and that I personally have
					and that the closure of the
afor	remention	ed facility ha	is been performed in	full and co	emplete accordance with the
fac	ility's clos	ure plan appı	oved in writing by t	he Departm	ent of Environmental Resources of
				rules and r	egulations of the Department
cod	lified at 25	Pa. Code C	hapter 75.		
	lake la	rysh Oic (Signe	ensky		SEPT. 10, 1986
	1 1	(Signa	ture)		(Date)
_					AL ONWEATER
					ACONSTERED A
		22011	_ P		A PROFESSIONAL AND
		27849			N JOHN JOSEPH ORANSKY
	(Professi	onal Enginee	ring License Number	r)	JOHN JOSEPH ORANSKY 19
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		•	•		
3	45 N. W.	YEMISSING	BLUD PO BOX	6307	
		(Business	Address)		(Seal)
	0 1 -	22 1.51	2.1		
	315	376-655	o Number	*******	·

OWNER OR OPERATOR CERTIFICATION OF CLOSURE

The undersigned, Kiwi Brands Inc., a (1) Corporation, (Name of Owner or Operator)
incorporated under the laws in the State of Pennsylvania and licensed to do business in
Pennsylvania, or (2) (Partnership, Individual, Municipality or Other Entity)
with its principal place of business at Route 662 North, Douglassville , which (Address)
formerly owned or operated a hazardous waste storage facility
(Description of Hazardous Waste Activity)
(hereinafter "Facility") known as Kiwi Brands Inc. and
(hereinafter "Facility") known as Kiwi Brands Inc. and (Name of Hazardous Waste Facility)
located at Route 662 North, Douglassville
(Location)
in <u>Berks</u> County, Pennsylvania, has completed and permanently ceased the active operation of the facility and has fully implemented all measures relating to the closure of the facility as set forth in the Closure Plan approved by the Pennsylvania Department of Environmental Resources for said facility.
NOW, THEREFORE, I (we) Kiwi Brands Inc. (Name of Owner/Operator)
hereby swear and affirm that the above-named hazardous waste facility has been closed in accordance with the facility's Closure Plan approved in writing by the Department on 10 September , 1986, that all measures relating to the closure of the facility required y the Closure Plan and the rules and regulations of the Department codified at 25 Pa. Code Chapter 75 have been fully implemented, and that to the best of my (our) knowledge, no violations continue to exist that may have arisen prior to closure.
(Signature)
Vice President - Finance (Title)
Route 662 North, Douglassville, PA 19518 (Address)
Taken, sworn and subscribed before me, this /Social day of Lecteralia A.D. 1986 Notary (Notary) DAVID R. MAGILL. Notary Public DAVID R. MAGILL R. M
DAVID R. MAGILL. Berks County Douglassville, Berks County 29, 1987



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Reading District Office 625 Cherry Street Reading, Pennsylvania 19602 215-378-4175

September 10, 1986

Kiwi Brands Inc. Attention: Peter A Burke, Ph.D. Route 662, North Douglassville, PA 19518

Re: Closure Plan for Facility

PAD 097153399

Amity Township, Berks County

Dear Mr. Burke:

The Department received a hazardous waste closure plan for your facility on July 30, 1986, to remove a collection tank, two evaporator tanks and the overflow tank adjacent to the two evaporator tanks from the hazardous waste system. On August 19, 1986, an inspection of the above referenced units was conducted and it was determined that an additional sample should be collected from your overflow tank. This analysis dated August 21, 1986, along with the previously submitted analyses, confirm that the tanks have been adequately decontaminated.

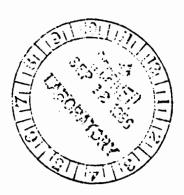
This letter is to approve the closure plan and related closure activities which have already occurred at your facility. Once the closure certification forms have been received at this office, closure of the above referenced units will be considered complete. If you have any other questions concerning this matter, please feel free to contact me at the above number.

Very truly yours,

MTCHAFL MAIOLIE

Waste Management Specialist

cc: Norristown Regional Office Reading District Office





ANALYTICAL REPORT

CLIENT: Kiwi Brands

Route 662 & Old Swede Roads

Douglassville PA 19518

PROJECT: 110817

PO NO:

10-FEB-92

REPORTED: RECEIVED:

05-FEB-92

WORK ORDER: 4129-005

REPORT TO: Dave Stanislawczyk

SSM/Spotts, Stevens and McCoy, Inc.

PROJECT DESCRIPTION:

Mineral Spirit Wells Groundwater

SAMPLING DATE: 05-FEB-92

TIME: 10:30 BY: Michael J. Bendetti

	UNITS	RESULT
SAMPLE: 1042007 MW-1 Water Total Petroleum Hydrocarbons	mg/1 -PPM	< 2.0
SAMPLE: 1042008 MW-2 Water Total Petroleum Hydrocarbons	mg/l	< 2.0
SAMPLE: 1042009 MW-3 Water Total Petroleum Hydrocarbons	mg/l	< 2.0

The sample was analyzed by EPA Method 418.1.

< Indicates less than the limit of quantitation.

Respectfully submitted,

John R. Womer,

Group Leader, General Chemistry



REQUEST FOR LABORATORY **ANALYTICAL SERVICES**

. . .

Address: WO. No. 4:29-005 Phone Report Repussable PAXReport Report to: Spotts, Stevens & McCoy DAVE STANISLAW CZYK Report to: Project Description: MINERAL SPIRIT UJELLS Sampled five. MTB Date/Time: 6/1://91 13 CLIENT SAMPLE ONTAINERS DESCRIPTION REQUESTED TO Date: Time: Custody relinquished by: To: Custody relinquished by: Time: Custody relinquished by: To: Custody relinquished by: Time: Time	Client Name:	KIWI BRAN	005	P.O. No:
Sports, Stevens & McCoy DAVE STANISLAW C2YK Report to: Project Description: MINERAL SPRIT WELLS Sampled five MTB Date/Time: 6/11/91/13 CLIENT SAMPLE OF SAMPLE DESCRIPTION REQUESTED MW / I WALLA TPH MW 3 I III Delivery to laboratory Custody relinquished by: To: Date: Time: Custody relinquished by: To: Custody relinquished by: To: Custody relinquished by: To: Date: Time: Time	Address:			W.O. No: 4129-005
Sports, Stevens & MrCoy DAVE STANISLAW C2YK Report to: Report to: Report to: Report to: Lab Approval Priority charges authorized by diente Project Description: MINERAL SPRIT IVELLS Sampled five. MTB Date/Time: 6/1: /91 13 CLIENT SAMPLE OP SAMPLE ID CONTAINERS DESCRIPTION WALLY TO: Custody relinquished by: To: Date: Time: Custody relinquished by: To: Date: Time: Custody relinquished by: To: Date: Time: Time: Custody relinquished by: To: Date: Time:				Phone Report Requested:
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	Custody :	relinquished by:	Date:	
Comments/Special Requests MUS deed just contain worth water to bance				
				7

Distribution: white - original pink - report yellow - laboratory gold - sample receipt

Form No: LOSA REV. 12/90



ANALYTICAL REPORT

CLIENT: Kiwi Brands

PROJECT: 105911

Route 662 & Old Swede Roads

Douglassville PA 19518

PO NQ:

28-JUN-91

REPORTED: RECEIVED:

18-JUN-91 WORK ORDER: 4129-005

REPORT TO: Dave Stanislawczyk

SSM/Spotts, Stavens and McCoy, Inc.

PROJECT DESCRIPTION:

Mineral Spirit Wells

SAMPLING DATE: 18-JUN-91

TIME: 13:45

BY: MJB

UNITS

RESULT

SAMPLE: 1022455

MW 1 Water

Total Petroleum Hydrocarbons

mg/l

< 2

SAMPLE: 1022456

MW 3 Water

Total Petroleum Hydrocarbons

mg/1

2.9

< Indicates less than the limit of detection.

Respectfully submitted,

John R. Womer, Group Leader, General Chemistry



Tri-County Business Camous 88 Robinson Street Pottstown, PA 19464 215 • 327 • 4850 215 • 327 • 4852 FAX

KIWI Brands

Rt. 662 North

Douglassville, PA 19518

RMC Number

: 9397

Sample Description: WELL #1

TOT.PETROLEUM HYDROCARBONS (LIQUID)

Report No.: 903539

Sample Date: 12/19/90

Sampled By : DCF

Received : 12/19/90 Reported : 12/20/90

P.O. Number: N/A

Date Anl Ana-

Repl Parameter

1

Result

Completed lyst Method

<0.82 MG/L

12/20/90

RSL

EPA 418.1

Approved 8y:

Tuila E. Dixon

Assistant Laboratory Manager

Page 1 of 3



Tri-County Business 88 Robinson Street Pottstown, PA 19464 215 • 327 • 4850 215 · 327 · 4852 FAX

KIWI Brands

Rt. 662 North

Douglassville, PA 19518

Sampled By : DCF

Received : 12/19/90

Report No.: 903539

Sample Date: 12/19/90

Reported : 12/20/90

P.O. Number: N/A

RHC Number

: 9378

Sample Description: WELL #2

Date Anl

Completed lyst

Method

TOT.PETROLEUM HYDROCARBONS (LIQUID)

<0.82 MG/L

Result

12/20/90 RSL

EPA 418.1

Approved By:

Twila E. Dixon

Assistant Laboratory Manager

Page 2 of 3



Tri-County Business Campus 88 Robinson Street Pottstown, PA 19464 215 • 327 • 4850 215 · 327 · 4852 FAX

KIWI Brands

Rt. 662 North

Douglassville, PA 19518

Report No. : 903539

Sample Date: 12/19/90

Sampled By : DCF

Received : 12/19/90

Paparted : 12/20/90

P.O. Number: N/A

fiche Numbe:

Repl Parameter .

: 6277

Sample Description: WELL #3

Date Ani

Completed lyst

Method

TOT.PETROLEUM HYDROCARBONS (LIQUID) 3.21 MG/L

Result

12/20/90 RSL

EPA 418.1

Approved By:

Twila E. Dixon

Assistant Laboratory Manager

Page 3 of 3



Tri-County Business 88 Robinson Street Pottstown, PA 19464 215 • 327 • 4850 215 • 327 • 4852 FAX

KIWI Brands Rt. 662 North

Douglassville, PA

RMC Number

Repl

: 5825

Sample Description: WELL #1

TOT.PETROLEUM HYDROCARBONS (LIQUID)

Report No.: 902088

Sample Date: 08/21/90

Sampled By : DF

Received : 08/21/90

Reported : 08/28/90

P.O. Number: N/A

Date Ani

Completed

Method

08/27/90

EPA 418.1

Approved By:

Ivila E. Dixon

Assistant Laboratory Manager



Tri-County Business Campus 88 Robinson Street Pottstown, PA 19464 215 • 327 • 4850 215 • 327 • 4852 FAX

EPA 418.1

KIWI Brands Rt. 662 North

Douglassville, PA 19518

Report No.: 902088 Sample Date: 08/21/90 Sampled By : DF

Received : 08/21/90 Reported : 08/28/90

RMC Number : 5826 Sample Description: WELL #3

P.O. Number: N/A

Date Anl Repl Parameter Completed lys **Method** TOT.PETROLEUM HYDROCARBONS (LIQUID) 17.8 MG/L 08/27/90 RSL

Approved By:

Thila E. Dixon

Assistant Laboratory Manager

Page 2 of 2

Appendix B

Support Documentation

Appendix B Part A
Documents Obtained During File Review

Table of Contents

Appendix B Part A Documents Obtained During File Review

- Correspondences between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated April 8, 1986:
 Subject: Letter requesting delisting of the Kiwi facility from hazardous storer/treater status.
- Correspondence between Kiwi Brands, Inc. and USEPA dated May 7, 1986: Subject: Additional information for the RCRA Part B application.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated September 10, 1986:
 Subject: Approval letter for the closure of a collection tank, two evaporator tanks, and an overflow tank.
- Correspondence between Kiwi Brands, Inc and Pennsylvania Department of Environmental Resources dated September 18, 1986:
 Subject: Closure certification forms for a collection tank, two evaporator tanks, and the overflow tank.
- RCRA Prioritization System Scoring Summary for the Kiwi facility, dated October 30, 1991.
- Hazardous Waste Inspection Report Generators Part A dated September 18, 1996.

KIWI POLISH KIWI BRANDS INC.





RT. 662 NORTH. DOUGLASSVILLE. PA 19518 > PHONE: (215) 385-3041 - CABLES: KIWI DOUGLASSVILLE - TELEX: 846384 > FAX: (215) 385-6177

8 April 1986

RECEIVED
PA SECTION

JUN 1 7 1986

EPA, R3

Division of Hazardous Waste Management Bureau of Solid Waste Management Commonwealth of Pennsylvania Department of Environmental Resources P. O. Box 2063 Harrisburg, Pennsylvania 17120

REFERENCE: PAD097153399

Gentlemen:

Since our initial filing as storer/treater of hazardous waste in a concrete evaporative tank, changes in our manufacturing operation has caused the material to become non-hazardous. The only hazard associated with the original sludge was the accumulation of an organo-metallic compound which was EP toxic due to the presence of mercury. Analysis of the waste stream during the course of operation demonstrate that the waste was never EP toxic since the EP toxic leachate demonstrated less than .2 ppm. Nevertheless, we have continued to manifest the waste as hazardous as a conservative position in accordance with the RCRA regulations. Reformulation of our products has eliminated this organo-mercuric compound and, therefore, this sludge no longer constitutes EP toxic waste.

To support this position, please find enclosed copies of recent laboratory analyses of the sludge in the concrete evaporative tank demonstrating no EP toxic mercury.

In due course we hope to hear from you indicating a delisting of our facility as being a hazardous storer/treater.

Additionally, within the last year, our company name has been changed from The Kiwi Polish Company Pty. Ltd. to Kiwi Brands Inc.

coled by



Department of Environmental Resources Page 2 8 April 1986

Thank you in advance for your cooperation.

Yours truly,

Peter A. Burke, Ph.D. Laboratory Manager

js

CC: M. G. Maiolie
PA Department of Environmental Resources
625 Cherry Street
Reading, PA 19602

Mr. Thomas Voltaggio
Acting Director, Enforcement Division
U.S.E.P.A.
Region III
6th and Walnut Streets
Phila., PA 19106

ER-SWM-53: Rev. 3/82

BUREAU OF SOLID WASTE MANAGEMENT NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

I INSTALLATION'S EPA I.D. NUMBER	
A DO 9 71 5 3 3 9 9	
<u></u>	e të përme të e kësë etë e e të përme e të përme e dë e ë të e
KIWI BRANDS INC.	
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. Pouto 662 North	
Route 662 North	ST. ZIP CODE
Douglassville	PA 19518
IV LOCATION OF INSTALLATION	and the Committee of th
STREET OR ROUTE NUMBER	MUNICIPALITY
Route 662 North	Douglassville
CITY OR TOWN ST.	ZIP CODE
Douglassville PA	19518 Berks
V INSTALLATION CONTACT,	
MAME AND TITLE (last, first, & job title)	PHONE NO. fares code & re
P. A. Burke, Laboratory Manager	21 5 38 5 30 4
VI OWNERSHIP	Etak ing makalang pada ing mgikula digilik tahunit, a Johan Kolon ing mgi
TO THE STATE OF THE A. NAME OF INSTALLATION	S LEGAL DWNER THE THE SOLVE STREET, AND THE STREET
Kiwi Brands Inc.	
B. TYPE OF OWNERSHIP	
(enter the appropriate letter into box)	
F = FEDERAL M = NON-FEDERAL M	
VII SIC CODES (4-digit in order of priority)	
A. FIRST	C, THIRD
(specify)	(specify)
NONE B. SECOND	LL 1 NONE D. FOURTH
(specify) NONE	(specify) NONE
VIIL TYPE OF HAZARDOUS WASTE ACTIVITY	
A. GENERATION C. STORE . TRANSPORT	ORTATION G. REUSE, RECYCLE, RECLAIM
D. DISPOSE F. PERMIT	
IX MODE OF TRANSPORTATION (transporters only)	NONE
A. AIR S. RAIL . C. HIGHWAY D. WATER	E. OTHER (specify):
X EXISTING ENVIRONMENTAL PROGRAM PERMITS	
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Environmental Chemistry Laboratory, Fricks Lock Rd., RD #1, Pottstown, PA 19464 (215) 326-9662

CERTIFICATE OF ANALYSIS

See Below LABORATORY NO:

RECEIVED: 24 Sep 1985

REPORTED: 31 Oct 1985

CLIENT:

Kiwi Brands, Inc.

Route 662 North

Douglassville, PA 19518

Sample Date: 8/29/85 and 9/24/85

Sampled By:

John Hughes

SAMPLE DESCRIPTION:

		Total	Analysis*			E.P. Toxicity	Leachate Anal	ysis
		9-24-85-N-SP	9-24-85-N	8-29-85-5	1121	9-24-85-N-SP	9-24-85-N	8-29/85-S
Paramèter	Units	RMC#2522-85	RMC#2523-85	RMC#2524-85	Units	RMC#2522-85	RMC#2523-85	RMC#2524-85
Mercury, Total	mg/kg	515	0.20	0.60	mg/l	20	0.004	0.012

*As Received

Environmental Chemistry Laboratory

= North Pit

= South Pit

SP = Spiked

Sample 9-24-85-N-SP - same as 9-24-85-N only spiked with approximately 500 ppm Hg (Troysan).

A Cancerra Company

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 > PHONE: (215) 385-3041 > CABLES: KIWI DOUGLASSVILLE > TELEX: 846384 > FAX: (215) 385-6177

9 April 1986

Mr. Thomas Voltaggio
Acting Director, Enforcement Division
U.S. Environmental Protection Agency
Region III
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

REFERENCE: PAD097153399

Dear Mr. Voltaggio:

Please find enclosed a letter to the PA Department of Environmental Resources requesting delisting of our concrete evaporative tank from being a hazardous operation. In addition to the letter mentioned above, there are laboratory analyses to support this position as well as a change of notification of hazard activity as required by the D.E.R.

If you have any questions, please contact me.

Yours truly,

Peter A. Burke, Ph.D. Laboratory Manager

js

cc: Commonwealth of Pennsylvania Department of Environmental Resources P. O. Box 2063

Harrisburg, PA 17120

Enc:

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 ● PHONE: (215) 385-3041 ● CABLES: KIWI DOUGLASSVILLE ● TELEX: 846384 ● FAX: (215) 385-6177

7 May 1986



Mr. Stephen R. Wassersug, Director Hazardous Waste Management Division U.S.E.P.A. Region III 841 Chestnut Building Philadelphia, PA 19107

REFERENCE: PAD097153399

Your letter received 24 April 1986, 3HW33

Dear Mr. Wassersug:

Pursuant to your request for the required Part B application under RC regulations for finalization of interim status for treater/storer facility, please find enclosed the following information:

- 1. On April 8, 1986 we wrote to the Department of Environmental Resources, Commonwealth of PA with a copy to Mr. Thomas Voltaggio, U.S.E.P.A., indicating that we wish to delist our facility as treater/storer of hazardous waste since the organo-mercuric compound that constituted the sludge as being hazardous waste has been eliminated as a waste stream.
- Also attached please find a Notification of Hazardous Waste Activity form which was filed at the same time and updated on 6 May.
- 3. Finally, although we did file for interim status with regard to the organo-mercuric compound subsequent analyses of this sludge was found not to contain EP toxic leachate as demonstrated by analytical results from contract testing laboratories.

Mr. Stephen R. Wassersug, Director Hazardous Waste Management Division U.S.E.P.A. Page 2 7 May 1986

Believe with this information it is not necessary for us to proceed with a formal permit application and request to be relinquished from these obligations as delineated in your letter received April 28.

Yours truly,

Peter A. Burke, Ph.D. Laboratory Manager

js

Enclosures:



E. PA. 38-005 N.J. DEP 77374 Licensed Analytical Laboratories



28 S. HANOVER STREET, POTTSTOWN, PA. 19464 215 / 327-0880 125 MAIN AVENUE, ELMWOOD PARK, N.J. 07407 201 / 791-6700

May 21, 1984

For KIWI Rt. 662 North Douglassville, Pa. 19518

Identification of Samples:	05-0484-17
Date Sampled 5/4	
Date Received 5/4	Time 2:25
Sampled By	Rec. by
Date Complete 5/17/84	Tested by Wastex

PARAMETER	RESULT
Total Mercury	9.0 mg/kg
EP Toxic Mercury	.20 mg/l
Hey Chrome	.10 mg/1









28 S. HANOYER STREET POTTSTOWN, PA. 19464 215/327-0880

LAB# 04-3082-09

For The Kiwi Polish Company Pty, Ltd. Douglassville, PA 19518

Attn: Ed Strauch

EPA License 38-0 Penna. Dept. of H Date Sampled:	05 MIO lealth License 148-B 4/30/82	
Sampled By:	Customer	The second of the second
Date Completed_	5/7/82	
Tested By:	Wastex	
•		

•	P.O. #
Identification of Samples:	# 18 · · ·
1. North side - Sludge	5
2. South side - Sludge	SS SS
3.	2) O
4. ·	Z 3
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Tested By:	Wastex	 				Class of Sample:	∏ Grab ∏ Ö	rab Compo	 site □ Cont	tinuous
Analysis	#1	#2	#3	*4		Analysis	*1	# 2	#3	
BOD (5 day 20°C) mg/1										
COD mg/1							WE	TALS		
Dissolved Oxygen mg/1						Arsenic mg/1				
TOC mg/1						Barium mg/1				
Relative Stability					П	Cadmium mg/1				
Acidity mg/1 CaCo ₃						Calcium mg/1				
linity mg/1 CaCO ₃						Chromium mg/1				<u> </u>
iness mg/1 CaCO ₃						Copper mg/1				
рН						Iron mg/1				
Spec Cond Umhos/cm						Lead mg/1				
Specific Gravity						Magnesium mg/1				
Color					х	Mercury mg/1 (Total	128.	177.2		
Odor						Selenium mg/1				
Turbidity			T			Silver mg/1				
Bromide mg/1				ľ			BACTERI	OLOGICA	\1	
Chloride mg/1							BACIENI	OLUGICA	\ L	
Chlorine-Residual mg/1						St. Plate Count No/ml				
Cyanide mg/1	7					Total Coliform No/100ml				<u> </u>
Fluoride mg/1						Fecal Coliform No/100ml				
Ammonia Nitrogen mg/1						Streptococcus				
Nitrate Nitrogen mg/1						Staphylococcus				
Nitrite Nitrogen mg/1						Salmonella				
Organic Nitrogen mg/1						E. Coli				
Total Phosphate as P mg/1						Yeasts and Molds				
Orthophosphate as P mg/1						OTHER				
Silice mg/1							<u> </u>			
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Detergents mg/1			1			i i i i i i i i i i i i i i i i i i i	Recha	rock		1
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CODVERSIONS. 2869 Sandstone Drive / Hatfield, Pennsylvania 19440 / 215-822-8996

Waste Cenerator: Kiwi Polish Company, PTY-LTD.

Waste Identification: Semi-Solid Wastewater Sludge

Lati Code: 1034

lest Parameter	lotal Analysis	E/P Leachate
Total Pesidue	26.1%	0.03
Total Dissolved Solids	9.2%	0.6%
Total Volatile Solids	3.5%	× 0,11
рН	9.2	4.3
Cyanides	88.5 mg/Kg	9_mg/L
Oil & Grease	11.3 mg/Kg	449 ¬g/L
Ammonia, N	226.3 mg/Kg	11.2 mg/L
Pheno1	684 mg/Kg	39.2 mg/L
Arsonic	2.8 mg/Kg	0.317 mg/L
Ant imony	N/A	< 0.1 mg/L
Bartum	13.6 mg/Kg	0.15 mg/L
Cadminan	30.5 mg/Kg	0.091 mg/L:
Chromin.	4. 5 mg/Kg	0.04 mg/L
Lead	28.8 mg/Kg	0.248 mg/L
Mencury	1.4 mg/Kg	0.037 mg/L
Hickel	18.2 mg/Kg	0.28 mg/L
Selenium	1.8 mg/Kg	0.001 mg/L
Silver	< 4.5 mg/Kg	0.02 mg/L
Copper	4. 5 mg/Kg	0.18 mg/L
Molybaenum	< 4.5 mg/Kg	0.01 mg/L
Zinc	11.4 mg/Kg	3.64 mg/L
Heating Value	N/A	
Ignitability	N/A	
Corrosivity	Waste is <u>NOT</u> Corrosive, per	75.261 g 3.
Reactivity	Waste is <u>NOT</u> Reactive, per	
Total Organic Halogens		N/A
COD		4,775 mg/L
тос		31,260 mg/L

DATE: 5/-1/82

MALYSIS COMPLETED DO: Pel Emilion

Lie

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE. PA 19518 . PHONE: (215) 385-3041 . CABLES: KIWI DOUGLASSVILLE . TELEX: 846384 . FAX: (215) 385-6177

7 May 1986

Division of Hazardous Waste Management Bureau of Solid Waste Management Commonwealth of Pennsylvania Department of Environmental Resources P. O. Box 2063 Harrisburg, Pennsylvania 17120

REFERENCE: PAD097153399

Gentlemen:

In reviewing our letter of 8 April 1986 requesting a change in hazardous waste status by requesting our facility be declassified as a storer of hazardous waste, we have noted than an error was committed in finalizing the Notification of Hazardous Waste Activity form.

To be specific, in description of hazardous waste, Section 12, Part A, our activities were listed as none. This is not entirely correct since we do generate some hazardous wastes which are designated by EPA code F001 and F005 as well as ignitable materials. However, these materials are not stored nor treated but are merely generated and properly disposed of within the permissible 90-day period. Therefore, would you please update our file with the enclosed Notification of Hazardous Waste Activity form which has the specific listings.

Yours truly,

Peter A. Burke, Ph.D. Laboratory Manager

js

CC:
Mr. G. Maiolie
PA Dept. of Env. Resources
625 Cherry St.
Reading, PA 19602

Mr. Thomas Voltaggio Acting Director U.S.E.P.A. Region III 6th and Walnut Streets Phila., PA 19106 ER-SWM-53: Rev. 3/82

BUREAU OF SOLID WASTE MANAGEMENT NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NUMBER		Exclusive Section (I
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		PA 19518	
Douglassville IV LOCATION OF INSTALLATION	enter of the second		٠.
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Route 662 North			
CITY OR TOWN THE CARREST AND	ST. ZIP COD	COUNTY	
Douglassville	PA 19518	Berks	
V INSTALLATION CONTACT			
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P.A. Burke, Laboratory Manager VI OWNERSHIP	programme in community and the first of the	[2] 1 5 3 8 5 3 0	4.
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Kiwi Brands Inc. B. TYPE OF OWNERSHIP		Reference of the second second	
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VIIL TYPE OF HAZARDOUS WASTE ACTIVITY			
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A. FIRST NOTIFICATION X C. DELETION	OF A WASTE	E. DELETION OF AN ACTIVITY	•
B. CHANGE OF GENERAL INFORMATION D. ADDITION	OF A WASTE	F. ADDITION OF AN ACTIVITY	•

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KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 : PHONE: (215) 385-3041 . CABLES: KIWI DOUGLASSVILLE . TELEX: 846384 . FAX: (215) 385-6177

8 April 1986

۲,

Division of Hazardous Waste Management Bureau of Solid Waste Management Commonwealth of Pennsylvania Department of Environmental Resources P. O. Box 2063 Harrisburg, Pennsylvania 17120

REFERENCE: PAD097153399

Gentlemen:

Since our initial filing as storer/treater of hazardous waste in a concrete evaporative tank, changes in our manufacturing operation ha caused the material to become non-hazardous. The only hazard associated with the original sludge was the accumulation of an organo-metallic compound which was EP toxic due to the presence of mercury. Analysis of the waste stream during the course of operation demonstrate that the waste was never EP toxic since the EP toxic leachate demonstrated less than .2 ppm. Nevertheless, we have continued to manifest the waste as hazardous as a conservative position in accordance with the RCRA regulations. Reformulation of our products has eliminated this organo-mercuric compound and, therefore, this sludge no longer constitutes EP toxic waste.

To support this position, please find enclosed copies of recent laboratory analyses of the sludge in the concrete evaporative tank demonstrating no EP toxic mercury.

In due course we hope to hear from you indicating a delisting of our facility as being a hazardous storer/treater.

Additionally, within the last year, our company name has been changed from The Kiwi Polish Company Pty. Ltd. to Kiwi Brands Inc.

Department of Environmental Resources Page 2 ... 8 April 1986

Thank you in advance for your cooperation.

Yours truly,

reter A. Burke, Ph.D. Laboratory Manager

js

cc: M. G. Maiolie
PA Department of Environmental Resources
625 Cherry Street
Reading, PA 19602

Mr. Thomas Voltaggio
Acting Director, Enforcement Division
U.S.E.P.A.
Region III
6th and Walnut Streets
Phila., PA 19106

ER-SWM-53: Rev. 3/82

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B. CHANGE OF GENERAL INFORMATION

BUREAU OF SOLID WASTE MANAGEMENT NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NUMBER				
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KIWI BRANDS INC				
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Douglassville			PA	19518
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Kiwi Brands Inc.				
B. TYPE OF OWNERSHIP				
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VII SIC CODES (4-digit in order of priority) A. FIRST		o proportion and appropriate C	THIRD	
(specify)		(specify)	. I HIND	- XII X II -
NONE		L NO	NE.	Supposed of the second of the
(specify)		1 Manaciful d		and the second of the second o
VIII TYPE OF HAZARDOUS WASTE ACTIVITY	GAV 10 14 10 10 10 10 10 10 10 10 10 10 10 10 10	NO	NE	r miliera St. miertualie. View zelen
A. GENERATION C. STORE				TO SECTION AND ADDRESS OF THE PARTY OF THE P
	U COMPLE	TE ITEM IX)		ECYCLE, RECLAIM
B. TREAT D. DISPOSE	F, PERMIT S	Y RULE	H. OTHER (S	pecify): NONE
IX MODE OF TRANSPORTATION (transporters only)			Partition of the Partit	· 经基本公司 1995年
A. AIR - B. RAIL : C. HIGHW	AY 🔲 D. WATER	E. OTHER (Speci	fy):	
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A. NPDES (Discharges to Surface Water) D. PSD (A)	ir Emissians from Proposed	Sources	······································	327 · · ·
B. UIC (Underground Injection of Fluids)	E. SOLID WASTE		(s. 1944) i sa ngalawan Kalaya, sa katana nafitani akilaya Kalaya, sa katana nafitani akilaya	
	T T T T T		and depletion on the second	
ROBE (the second				•
C: RCRA (Hazardous Wastes)	F. OTHER	lso:	cify)	er treet grand and an experience of
		NONE -	Just E.P	.A. ID. NO.
I. TYPE OF NOTIFICATION,	and the second	u sur trivial	The state of the	
Mark "X" in appropriate box to indicate whether this	is your installation's first	notification of hazardous	waste activity, o	
general information, hazardous waste handled, or hazardous TIONS).	s waste activity, if you ch	eck B, C, D, E, or F, att	ach a letter of ex	planation (SEE INSTRI
☐ A. FIRST NOTIFICATION 😾	C. DELETION OF A W	ASTE [E. DELETIC	ON OF AN ACTIVITY

D. ADDITION OF A WASTE

F. ADDITION OF AN ACTIVITY

Environmental Chemistry Laboratory, Fricks Lock Rd., RD #1, Pottstown, PA 19464 (215) 326-9662

CERTIFICATE OF ANALYSIS

See Below LABORATORY NO:

RECEIVED: 24 Sep 1985

REPORTED: 31 Oct 1985

CLIENT:

Kiwi Brands, Inc.

Route 662 North

Douglassville, PA 19518

Sample Date: 8/29/85 and 9/24/85

Sampled By: John Hughes

SAMPLE DESCRIPTION:

		Total	Analysis*			E.P. Toxicity	Leachate Anal	ysis
		9-24-85-N-SP	9-24-85-N	8-29-85-S		9-24-85-N-SP	9-24-85-N	8-29/85-S
Paramèter	Units	RMC#2522-85	RMC#2523-85	RMC#2524-85	Units	RMC#2522-85	RMC#2523-85	RMC#2524-85
Mercury, Total	mg/kg	515	0.20	0.60	mg/l	20	0.004	0.012

*As Received

Environmental Chemistry Laboratory

= North Pit = South Pit = Spiked

Sample 9-24-85-N-SP - same as 9-24-85-N only spiked with approximately 500 ppm Hg (Troysan).



KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 . PHONE: (215) 385-3041 . CABLES: KIWI DOUGLASSVILLE . TELEX: 846384 . FAX: (215) 385-6177

9 April 1986

Mr. Thomas Voltaggio
Acting Director, Enforcement Division
U.S. Environmental Protection Agency
Region III
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

REFERENCE: PAD097153399

Dear Mr. Voltaggio:

Please find enclosed a letter to the PA Department of Environmental Resources requesting delisting of our concrete evaporative tank from being a hazardous operation. In addition to the letter mentioned above, there are laboratory analyses to support this position as well as a change of notification of hazard activity as required by the D.E.R.

If you have any questions, please contact me.

Yours truly,

Peter A. Burke, Ph.D.

Laboratory Manager

js

cc: Commonwealth of Pennsylvania
Department of Environmental Resources
P. O. Box 2063

Harrisburg, PA 17120

Enc:

Reading and particular to the second second

September 10, 1996

Kiwi Brands Inc. Attention: Peter A Burke, Ph.D. Route 652, Worth Douglassville, PA 19518

Pe: Closure Plan for Facility
PAD 097151399
Amity Township, Berks County

Dear Mr. Burke:

The Pepartment received a hazardous weate closure plan for your facility on July 30, 1986, to recove a collection tank, two evaporator tanks and the overflow tank adjacent to the two evaporator tanks from the faciardous waste system. On August 19, 1986, an inspection of the above referenced units was conducted and it was determined that an additional sample should be collected from your overflow tank. This enalysis detail angust 21, 1966, along with the previously submitted analyses, confirm that the tanks have been adequately decontaminated.

This letter is to approve the closure plan and related closure activities which have already occurred at your facility. Once the closure certification forces have been received at this office, closure of the above referenced units will be considered complete. If you have any other questions concerning this matter, please feel free to contact me at the above relater.

Very truly yours,

MICHAIL MAIGLIE
Veste Management Specialist

cc: forristown Regional Office Reading District Office

KIWI BRANDS INC.



RT. 662 NORTH. DOUGLASSVILLE, PA 19518 PHONE: (215) 385-3041 CABLES, KIWI DOUGLASSVILLE TELEX: 846384 FAX: (215) 385-6177

RECORD

18 September 1986

Mr. Michael Maiolie Waste Management Specialist DEPARTMENT OF ENVIRONMENTAL RESOURCES 625 Cherry Street Reading, PA 19602

Dear Mr. Maiolie:

We have received your letter of 10 September 1986 approving our closure plan for a collection tank, two evaporator tanks, and the overflow tank adjacent to the two evaporating tanks. Enclosed are the following completed closure certification forms:

- 1) Professional Engineer Certification of Closure
- 2) Owner or Operator Certification of Closure

With the completion of these forms, it is our understanding that the administrative closure for the units is now complete.

Very truly yours,

EDWARD R. STRAUCH, JR.

Senior Analytical Chemist

ERS/ep

Enclosures

OWNER OR OPERATOR CERTIFICATION OF CLOSURE

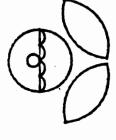
The undersigned, Kiwi Brands Inc., a (1) Corporation, (Name of Owner or Operator)
Incorporated under the laws in the State of <u>Pennsylvania</u> and licensed to do business in <u>Pennsylvania</u> or (2)
(Partnership, Individual, Municipality or Other Entity)
with its principal place of business at Route 662 North, Douglassville, which (Address)
formerly owned or operated a hazardous waste <u>storage facility</u> (Description of Hazardous Waste Activity)
(hereinafter "Facility") known as <u>Kiwi Brands Inc.</u> and (Name of Hazardous Waste Facility)
located at Route 662 North, Douglassville
(Location)
In Berks County, Pennsylvania, has completed and permanently ceased the active operation of the facility and has fully implemented all measures relating to the closure of the facility as set forth in the Closure Plan approved by the Pennsylvania
Department of Environmental Resources for said facility.
NOW, THEREFORE, I (we) Kiwi Brands Inc.
(Name of Owner/Operator) hereby swear and affirm that the above-named hazardous waste facility has been closed in
accordance with the facility's Closure Plan approved in writing by the Department on 'O September , 1986, that all measures relating to the closure of the facility required the Closure Plan and the rules and regulations of the Department codified at 25 Pa. Code mapter 75 have been fully implemented, and that to the best of my (our) knowledge, no violations continue to exist that may have arisen prior to closure.
(Signature)
(Signature)
Vice President - Finance
(Title)
Route 662 North, Douglassville, PA 19518 (Address)
Taken, sworn and subscribed before me, this / Sch day of lestender A.D. 1986
Mank & Bagel!
(Notary) DAVID R. MAGILL. Notary Public Davidesville, Berks County 1987
assettle Notary Public
DAVID R. MACILL. Books County Douglassville, Barks County My Complessor Expline Aug. 29, 1987

PROFESSIONAL ENGINEER CERTIFICATION OF CLOSURE

I, JOHN JOSEPH ORANSKY	, a Professional Engineer registered
(Name)	
pursuant to the Professional Engineers Reg	ristration Law, 63 P.S. \$\$148 et seq., hereby
certify that I have reviewed the Closure P.	
	(Type of Facility)
KINI BRANDS INC.	("facility"), located
(Name of Hazardous Waste F	
at RUSTE COL NEATH DOUGLAS	SVILLE PA. 19518
	ocation)
that I am familiar with the rules and regula	ations of the Pennsylvania Department of
Environmental Resources pertaining to clo	sure of such facility, and that I personally have
made visual inspection(s) of the aforement	
aforementioned facility has been performe	d in full and complete accordance with the
Candom base 10 26 and	by the Department of Environmental Resources or the rules and regulations of the Department
codified at 25 Pa. Code Chapter 75.	the titles and regulations of the Department
codified at 23 ra. Code Chapter 13.	
↓	
John Joseph Oronsky (Signature)	SEPT. 10 1986
(Signature)	(Date)
	ONWEAT
•	REMOTERED
	PROFESSIONAL
027549-E	N JOHN JOSEPH ORANSKY
(Professional Engineering License Num	iber)
	ENGINEER
SPOTIS, STEVENS + MC COY,	TAC No. 027849-E
and when we will Bill Para	WIND TO THE REAL PROPERTY OF THE PARTY OF TH
345 N WYCMISSING BLUD Po De	(Seal)
(Business Address)	(Deat)
	•
215-376-6551	
(Telephone Number)	



URGENT FAX



EPA REGION 3

deliver at once to MILL MELLINGER Mailcode KIWI BRANDS		
0	by KEVIN BOYD	This page is followed by a . Sent at $\frac{2 \cdot 55}{}$ (ti
Please	Sent by	This pa Sent at

BEEN ASSIGNED AS MOTECT MANAGER FOR YOUR FACILITY, IT YOU HAVE ANY QUESTIONS, PLEASE GIVE ME A CALL.

_(day)

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

PAD 097 153 399

EPA SITE NUMBER: KIWI BRANDS

DOUGLASSVILLE, PA

SCORED BY: KLF

OF DYNAMAC

ON 10/30/91

GROUNDWATER SCORE	:	60.60	,Vo
SURFACE WATER SCORE	E:	45.09	م دم
AIR ROUTE SCORE	:	3.67	NO
ONSITE SCORE	:	100.00	4ES

MIGRATION SCORE

: 62.69 425

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? Y

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : NA

NET PRECIPITATION (IN.) : NA

PHYSICAL STATE: NA

CONTAINMENT:

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHROMIUM

TOXICITY/PERSISTANCE VALUE: 18

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS: 0

DRUMS : 20

TARGETS

GROUNDWATER USE: DRINKING WATER

DISTANCE TO WELL (MILES): 0.5

EPA ID NO.: KIWI BRANDS PAD 097 153 399

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? Y
IS THERE A PERMITTED OUTFALL?
HAVE THERE BEEN PERMIT VIOLATIONS?

ROUTE CHARACTERISTICS

FACILITY LOCATION: NA

24-HOUR RAINFALL: NA

DISTANCE TO SURFACE WATER (MILES): NA

PHYSICAL STATE: NA

CONTAINMENT: NA

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHROMIUM

TOXICITY/PERSISTANCE VALUE: 18

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS: 0
DRUMS: 20

TARGETS

SURFACE WATER USE: POSSIBLE DRINKING WATER OR RECREATION

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 0.8

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 1.0

EPA ID NO.: KIWI BRANDS PAD 097 153 399

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON GOING RELEASE? N
DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? N
ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS? N
CAN CONTAMINANTS MIGRATE INTO AIR? Y
CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHROMIUM

TOXICITY/PERSISTANCE VALUE: 3

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS: 0
DRUMS: 20

TARGETS

POPULATION: RESIDENCES ARE LOCATED WITHIN FOUR MILES

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 1.0

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: UNLIMITED ACCESS

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? Y

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHROMIUM

TOXICITY/PERSISTANCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.08

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: Y

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

Date of Inspection	9.18-96	Time start	Time finish	
Name of Inspector	Susan Mi We	rner	<u> </u>	
Company, installation	name Kiwi E	Brands Inc.		
Location 447	OH Swede	Road		
County Berks		Municipalit	y : Amity Tup.	
Identification number	PAD 097	153 399		
Name of responsible o	fficial <u>Peter</u>	A. Burke		·
Title	Vice President	of Regiona	1 R+D	
Mailing Address	447 old Su	ede Road	Douglassville PA	19518-1239
Area code and telepho	ne number	385 3041	<u> </u>	
Name of person intervi	ewed Hike	Mellinger		
Title	Environme	ental Affairs	Magr.	
Mailing address (if diff	erent from above)	Same		
Area code and telepho	ne number	Sane		
Current waste har				
a. On-site	_	storage,	disposal	□ PBR
b. On-site	_	☐ reuse,	☐ recycle,	☐ reclaim
	treatment,	☐ storage,	☑ disposal	
.,		reuse,	∏ recycle,	☐ reclaim
d. 🗆 Off-site	☐ use,	□ reuse,	□ recycle,	- reciann
	dous waste produced:	161030	165/47	
	72,02	kg./mo.		
ь	1964,2	kg./yr.		
location and type)			Number and destination	
Waste Number	Destinatio	n Facility	Location and	і Туре
Dec 1 Sec 7 For 3 Desq 0006, For 2 For 5	ENSCO Inc.		El Dorado, AR	
Dai, Dev L. Dec 1, Dec 9 Do 34, UCSS FOCZ, FOCS, FOCS	ENSCO Inc.		Dalton GA	
	·			
I. Source Reduction:	🛱 accomplished, 🗖 p	roposed, 🗌 not prop	posed	

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name	Kiwi	Brands	Toc.	ID Number	PAD 097 153 399	Date	09-25-96	
								_

Hazardous Waste Inspection Report Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance **STATUS** CHAPTER UNE REQUIREMENT 2 3 4 CITATION ITEM 262.11 Hazardous waste determination, performed on all waste streams H₀01 Identification number 262.12 H002 Hazardous waste shipments offered only to licensed transporters 262.12(d) H003 **1**262.13 H004 Authorization received from TSD facility for wastes shipped off-site within 2 PA manifest used for intrastate shipments 262.20(b) H₀05 TSD state manifest or PA manifest used for out-of-state shipments 262.20(c) H006 Manifests filled out properly and completely H007 262.20(a) Ì Manifests routed properly and within time limits (7 days) 262.23(e)(f) H008 3 Proper U.S. DOT shipping containers or packages being used 262.30(1) HC 3 Shipping containers marked and labeled according according to U.S. DOT 262.30(2) H010 262.30(3) H011 Containers of 110 gal. or less permanently marked with required hazardous ١ waste label 262.33 H012 Placards offered to transporter 262.34(a)(1) Waste in containers or tanks accumulated on-site for less than 90 days H013 ١ Wastes placed in containers properly marked and labeled or in tanks 262.34(a)(2) H014 meeting requirements of Chapter 265, Subchapter J 262.34(a)(3) Containers managed in accordance with Chapter 265, Subchapter I (any non-H015 compliance for Subchapter I requirements is a violation of 262.34(a)(3)) 265.171 H016 a). All containers of haz, waste in good condition Containers compatible with hazardous waste being stored within 265.172 H017 b). 265.173(a) H018 c). Containers of hazardous waste kept closed 265.173(b) H019 d). Containers of hazardous waste are managed to prevent leaks 265.173(c) Containers of hazardous waste labelled to accurately identify contents H₀20 e). 265.174 H021 f). Haz, waste accumulation areas inspected at least weekly Special requirements for ignitable, reactive and incompatible waste 265,176 - .177 H022 a). being met Proper containment and collection system(s) 265.178 H02. h). Containers clearly marked with accumulation date and visible for inspection H024 262.34(a)(4) 262.34(a)(5) H025 On the job or classroom personnel training program as per 265.16

Hazardous Waste Inspection Report
Generators - Part B

4-Non-Compliance 1-No Violation Observed 2-Not-Applicable 3-Not-Determined **STATUS** LINE CHAPTER REQUIREMENT CITATION ITEM 3 4 Records retained at designated location for 20 years 262.40(a) H026 Quarterly reports submitted to the Department 262.41(a) H027 262.42 H028 Exception reporting procedures followed 262.45 H029 Hazardous waste disposal plan, if required Spill reporting procedures followed H030 262.46(a) 262.46(e) H031 Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265 262.50,.53, H032 Special requirements followed for international shipments .55, .60 262.80 H033 Source reduction strategy prepared and available

- 7.0

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: September 18, 1996 Company/Facility/Site Name: Kiwi Brands Inc.	Identification Number: PAD097153399
I arrived on-site and met with Mr. Mike Mellinger.	I explained I was there to conduct a hazardous waste generator
inspection and we proceeded on the inspection of the plant.	•
Three drums of hazardous waste were observed in the	ne production line 2 hazardous waste accumulation area. Al the
drums were labeled and dated.	
The facility was preparing to transport the next day.	Most of the drums in the 90-day accumulation area were
labeled and plastic wrapped on the pallet ready for transport	All the drums inspected in this area were properly labeled.
Kiwi does not have special containment for the hazardous wa	istes but uses the building as containment. Several cracks were
noted on the floor near the drums. These need to be repaired	
Four drums of acrosol hazardous waste were observe	ed in the acrosol storage area. These drums are kept with the
acrosol products in a special storage area designed to contain	any cans that may explode.
The solvent storage area contained one drum of haza	rdous waste ready for shipment and one drum that was not
f Both drums were labeled and dated.	•
The mineral spirit unloading area has been re-paved	since the spill last year. The area in now contained and drains
to a concrete holding pond. The new design should prevent n	nineral spirit spills from reaching the environment in the future.
After completing the inspection of the facility, we ret	urned to the office to review the records.
of the regulations. Please use the Chapter citations listed on this inspection report as a This inspection report is official notification that a representative of the Department installation. The findings of this inspection are shown in this report. This inspection re- inspection. Violations may also be discovered upon examination of the results of labor forthcoming, concerning any violations indicated herein and listing any additional violat This report does not constitute an order or other appealable action of the Department action for any violation noted herein.	of Environmental Protection, Waste Management Program, inspected the above port shall serve a formal notification of any violations which were observed during the atory analyses and review of Department records. Additional notification may be ions.
Pers Interviewed (Signature) Faxed + Mailed	Date10 -10 -16

Page 4 of 5

10-10-96

Date

Inspector (Signature)

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: September 18, 1996

Identification Number: PAD097153399

Company/Facility/Site Name: Kiwi Brands Inc.

Quarterly Reports

Quarterly reports were reviewed for the period of first quarter 1995 through fourth quarter 1995. The fourth quarter 1995 report will be the last quarterly report filed by the company because they have been notified by the Department that they are no longer required to file quarterly regards.

Inspection Logs

The hazardous waste storage area inspection logs were reviewed for the period of January 1996 to present. They inspections are being conducted weekly and no problems were observed with the log. Residual waste is also stored in the 90-day accumulation area and are included in the inspection.

Manifests

Manifests were reviewed for 1996 to present. No problems were observed.

RECOMMENDATIONS:

Repair the cracks in the flooring in the 90-day hazardous waste accumulation area.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was sho	noqer enti nwc
or that a copy was left with the person.	

-			_
Person Interviewed (Signature) _	Faxed + Mailed	Date 10 -10 .96	
	Joseph Wern	Date10 · 10 · 76	
Inspector (Signature)	Water III Cont	Uate	

Page 5 of 5

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

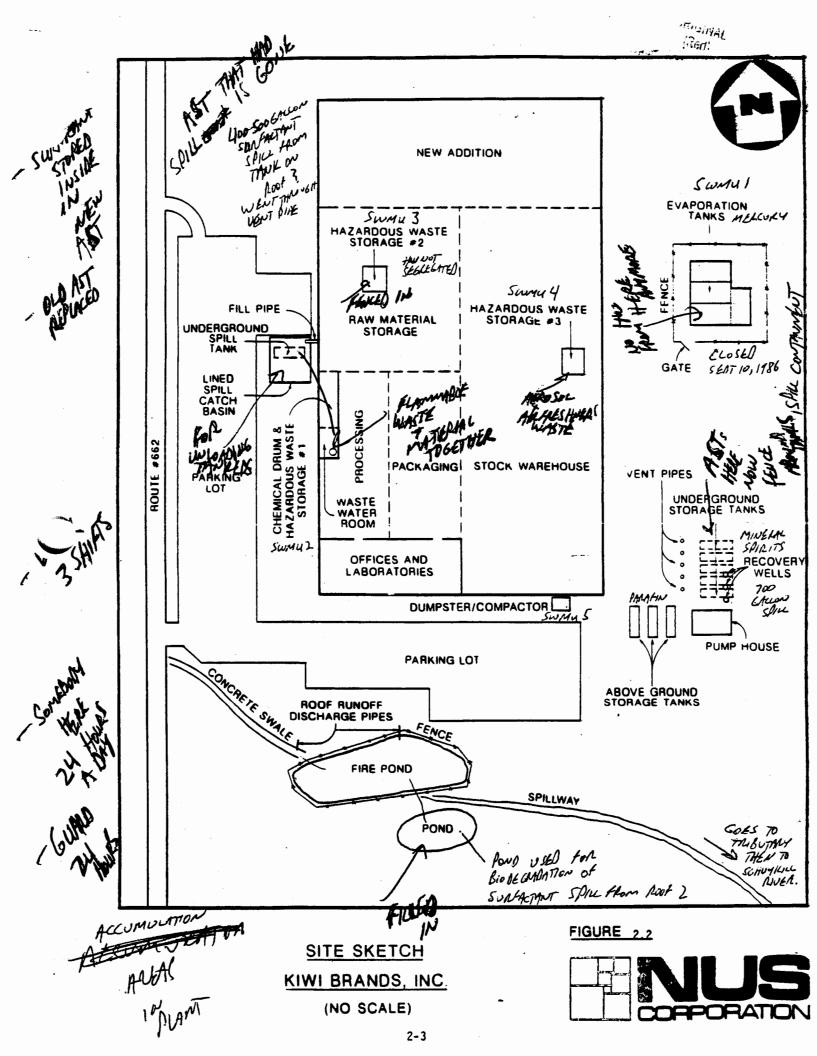
Appendix B Part B
Additional Documentation Obtained During Site Inspection

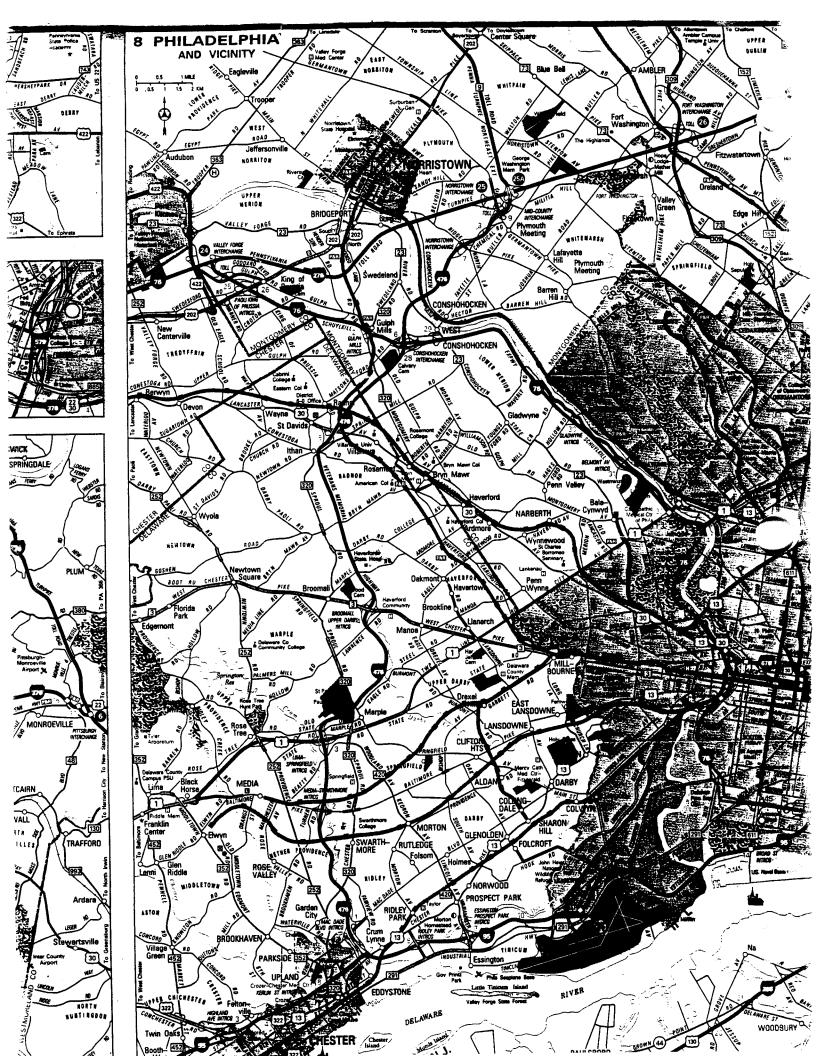
Table of Contents

Appendix B Part B Additional Documentation Obtained During Site Inspection

- Facility map no source and date.
- Correspondences between The Kiwi Polish Company and USEPA dated November 13, 1980:
 Subject: USEPA notifications letter that Kiwi must apply for a permit as a
 - Subject: USEPA notifications letter that Kiwi must apply for a permit as a treatment, storage, or disposal facility under the RCRA Hazardous Waste Program.
- Correspondences between The Kiwi Polish Company and USEPA dated November 19, 1980:
 Subject: Permit application for the RCRA Hazardous Waste Program.
- Correspondence between Kiwi Brands, Inc. and USEPA dated December 29, 1980: Subject: Acknowledgment of Application for a Hazardous Waste Permit.
- Correspondence between Kiwi Brands, Inc. and USEPA dated July 23, 1981:
 Subject: Letter indicating that the Agency has processed Kiwi's Part A Hazardous Waste Permit Application.
- Correspondence between Kiwi Brands, Inc. and USEPA dated October 2, 1981:
 Subject: Letter indicating that an error had occurred in the Part A Permit Application.
- Correspondence between Kiwi Brands, Inc and USEPA dated October 14, 1981:
 Subject: Acknowledgement letter from USEPA of receipt of Kiwi's request to change to "Conditions of Operations During Interim Status".
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated April 9, 1986:
 Subject: Letter requesting delisting of a concrete evaporative tank from being a hazardous operation. Letter contains backup analytical data.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated May 7, 1986:
 Subject: Correction to the Hazardous Waste Activity form submitted on April 8, 1986.
- Correspondence between Kiwi Brands, Inc. and USEPA dated June 4, 1986:
 Subject: Documentation of a telephone conversation.

- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated July 30, 1986:
 Subject: Documentation for the administrative closure of the evaporative concrete tanks.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated June 20, 1986:
 Subject: Construction of a third concrete evaporating tank.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated August 21, 1986:
 Subject: Analytical results for rainwater that has collected in the overflow concrete tank.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated September 10, 1986:
 Subject: Approval letter for the closure of a collection tank, two evaporator tanks, and an overflow tank.
- Correspondence between Kiwi Brands, Inc and Pennsylvania Department of Environmental Resources dated September 18, 1986:
 Subject: Closure certification forms for a collection tank, two evaporator tanks, and the overflow tank.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated August 4, 1986:
 Subject: Acknowledge receipt of a closure plan.
- Hazardous Waste Inspection Report Generators Part A, dated June 12, 1997.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Protection dated January 30, 1998:
 Subject: 1997 Hazardous Waste Report.







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS PHILADELPHIA. PENNSYLVANIA 19106

November 13, 1980

Dear Sir:

EPA has received your notification form which indicates that your facility may be engaged in the treatment, storage, or disposal of hazardous waste. The Resource Conservation and Recovery Act requires that owners and operators of such facilities must obtain a permit from EPA or an authorized State. In order for you to continue your current treatment, storage or disposal operations after November 19, 1980, your facility must qualify for "interim status". Facility owners and operators who qualify for "interim status" are treated as having a permit until EPA or an authorized State makes a final determination on the permit application.

Timely submission of both a notification, under Section 3010 of the Act, and a Part A application qualifies owners and operators of existing (in operation or under construction by November 19, 1980) hazardous waste management facilities for interim status. Facility owners or operators with interim status must also comply with interim status standards set forth in 40 CFR Part 265 (May 19, 1980) or with the equivalent provisions of authorized State programs.

Failure to submit a complete Part A by November 19, 1980 will jeopardize interim status and may result in enforcement action if the facility continues to handle hazardous waste. Forms 1 and 3 must be submitted together and Form 3 must be signed by the owner and operator. You need to submit only one Permit Application per site or location, provided that you describe all of the activities at that site or location. If you conduct hazardous waste activities at more than one site or location, you must submit a separate application for each site or location. Facilities may only handle the hazardous waste or use the processes listed in Part A.

If you have any question or need any assistance in completing the Part A application, please call Shirley Bulkin at 215-597-3751 or 1230.

Sincerely yours.

Thomas Voltaggio

Acting Director, Enforcement Division

THE KIWI POLISH COMPANY LTW

U.S.A. DIVISION

ROUTE 662, NORTH DOUGLASSVILLE, PA 19518



Phone: (215) 385-3041 Cables: Kiwi Douglassville Telex: 846384

19th November 1980

Mr. Thomas Voltaggio
Acting Director, Enforcement Division
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

REFERENCE: Pottstown EPA I.D. Number PADO02353910

Douglassville EPA I.D. Number PAD097153399 -

Dear Mr. Voltaggio:

As per your EPA recommendations, we have filed for a permit under the RCRA Hazardous Waste Program as a treater and storer at our Douglassville facility as indicated on the application that has been filed. It is undetermined whether hazardous waste will be treated or stored due to the fact that the surface impoundment is just initiating activity.

However, our Pottstown manufacturing capabilities, which were originally listed in the notification, are in the process of being moved to our new facility in Douglassville. For an interim period of time, this operation will still generate hazardous waste and, therefore, the notification is valid under that criteria but this facility is not a disposer, treater or transporter of hazardous waste.

Yours faithfully,

THE KIWI POLISH COMPANY PTY. LTD.

(U.S.A. Division)

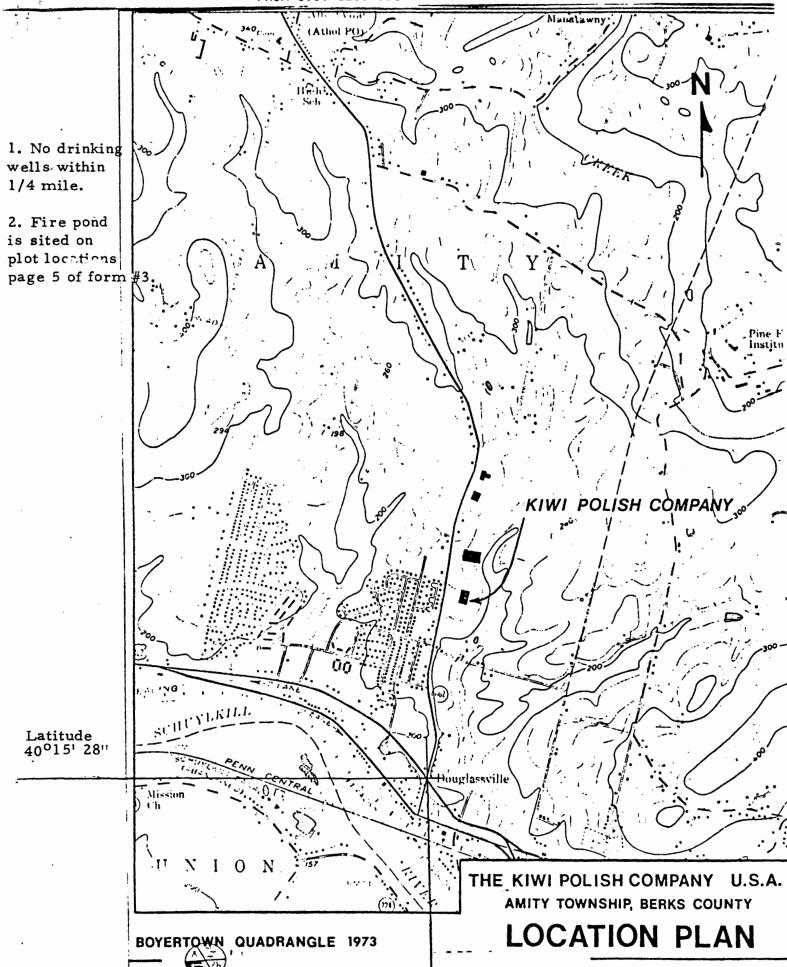
WILLIAM W. JAMISON

Vice President - Manufacturing

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FORM

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

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III. PROCESSES	(continued)
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. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

N/A

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste/s/ that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDSP	KILOGRAMSK
TONS	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous weste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

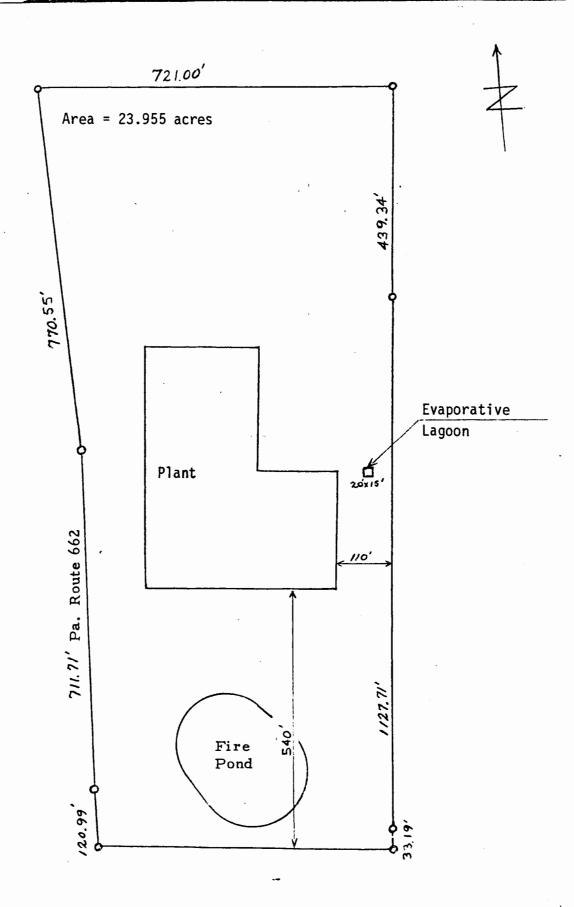
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V. FACILITY DRAWING				
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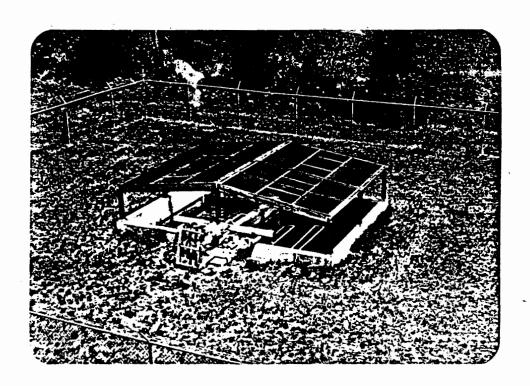
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WAFACILITY DRAWING (see page 4)



Scale: 1" = 200'-0



Photograph of Surface Impoundment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS PHILADELPHIA, PENNSYLVANIA 19106

EPA I.D. # PAD 097153399

December 29, 1980

The Kiwi Polish Co. Route 662 North Douglassville, Pa. 19518

Attn: Peter A. Burke

Re: Acknowledgment of Application a Hazardous Waste Permit

.This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility located at the address shown above; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information. EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS PHILADELPHIA, PENNSYLVANIA 19106

JUL 2 3 1981

Mr. W. W. Jamison Kiwi Polish Company - USA Division Route 662 North Douglasville, PA 19518

Dear Mr. Jamison:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,

Shirley D. Bulker Shirley D. Bulkin

Chief, Administrative Support Section Permit Enforcement Branch

Enclosure

CONDITIONS OF OPERATION DURING - INTERIM STATUS

Date Prepared: July 23, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

1. Facility name, location, and EPA Identification Number.

Name: Kiwi Polish Company - USA Division-

Location: Route 662 North

Douglasvi., PA 19518

EPA I.D. No.: PAD 09 715 3399

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Mr. W. W. Jamison - Vice President of Manufacturing Operator's Name:

III. During the period of interim status, the facility may use <u>only</u> the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

PROCESS	DESIGN CAPACITY
S04 T04	9000 Gals. 7 800 Gals/Day

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

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THE KIWI POLISH COMPANY (11):

ROUTE 662 NORTH, DOUGLASSVILLE, PENNSYLVANIA 19518



PHONE. (215) 385-3041 CABLES KIWI DOUGLASSVILLE TELEX. 846384

2 October 1981

Mr. Thomas Voltaggio
Acting Director, Enforcement Division
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

REFERENCE: Douglassville EPA I.D. Number PAD097153399

Dear Mr. Voltaggio:

During our initial filing as a treater and storer of hazardous waste in a surface impoundment, an error occurred by calling it a surface impoundment since closer inspection of the definition now of surface impoundment does not apply to our operation. Our particular treatment facility actually is a tank since the construction is impervious to leaching. The tank, as we would now like it to be reclassified, is constructed of seven inches reinforced concrete and, therefore, is obviously impervious to leaching and, furthermore, fulfills requirements of structural integrity.

Attached for your review is an engineering sketch of the tank.

Should you require further information concerning this topic, please contact the writer.

Yours truly,

Peter A. Burke

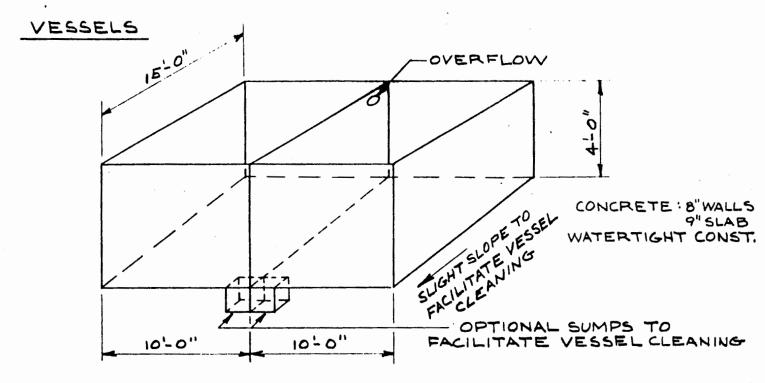
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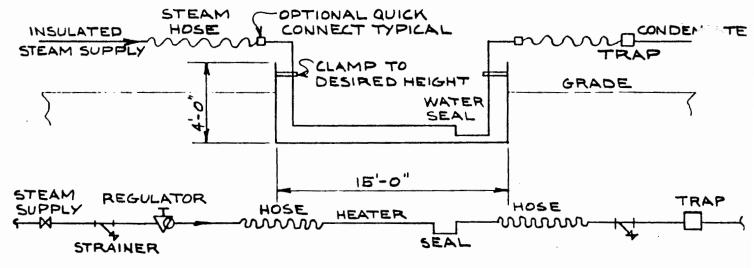
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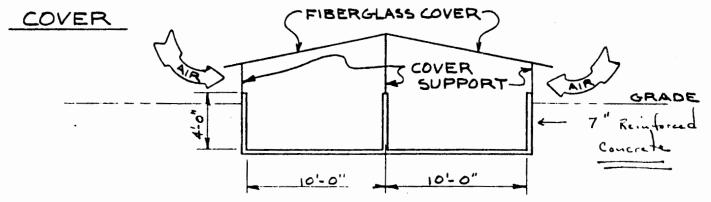
Please address all correspondence to the Company, not individuals.

CONCEPTUAL SKETCHES COMBINATION TREATMENT SHOWN NOT TO SCALE

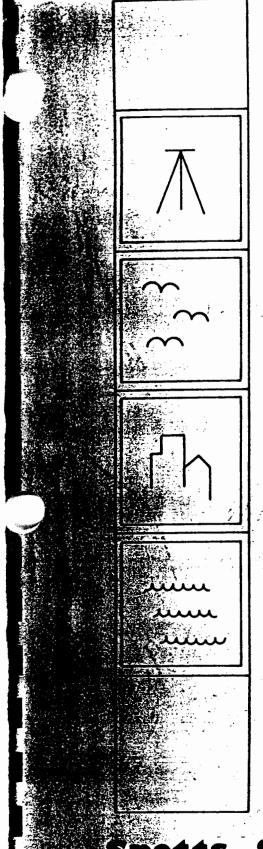


PIPING (STEAM ONLY SHOWN: WASTE MUST ALSO BE PIPED TO VESSELS)





VESSELS ARE SHOWN BELOW GRADE TO TAKE ADVANTAGE OF SOIL INBULATION, HOWEVER, BY RAISING THE COVER ELEVATION, THE VESSEL CAN BE LOCATED ABOVE GRADE, BUT VESSEL INSULATION IS THEN PREFERRED IF STEEL TANKS ARE SELECTED. THE METHOD OF VESSEL CLY THE MUST ALSO BE CONSIDERED IN THE DETERMINATION OF ABOVE



ENGINEERING REPORT
INDUSTRIAL WASTEWATER TREATMENT

THE KIWI POLISH COMPANY (USA)
AMITY TOWNSHIP
BERKS COUNTY
PENNSYLVANIA

MAY, 1979

Spotts, Stevens and McCoy, inc.

CONSULTING ENGINEERS
WYOMISSING, PENNSYLVANIA

ENGINEERING REPORT INDUSTRIAL WASTEWATER TREATMENT

THE KIWI POLISH COMPANY (USA)
AMITY TOWNSHIP
BERKS COUNTY
PENNSYLVANIA

MAY, 1979

Spotts, Stevens and McCoy, Inc.

Order No. 4129-001



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ENGINEERING REPORT

INDUSTRIAL WASTEWATER TREATMENT

THE KIWI POLISH COMPANY (USA)

AMITY TOWNSHIP

BERKS COUNTY

PENNSYLVANIA

INTRODUCTION

This report is submitted as a final engineering report subsequent and referenced to the "Preliminary Engineering Report" of October, 1978 (PER).

SUMMARY

Representative samples of industrial wastes and flow information were received from the Kiwi Polish Company (USA), Pottstown, Plant (hereafter Kiwi), and solar evaporation tests were run. Based upon the results of these tests, final design criteria for waste treatment facilities were obtainable pending selection of the favored process technique by Kiwi.Certain treatment techniques as presented in the PER have been disqualified because of high capital, operating, or maintenance costs or because of lack of design flexibility which may be required to allow for future unknown production changes which would subsequently be reflected in changes of chemical composition or flow rates of the waste water.

The final three (3) processes under consideration are:

(1) solar evaporation only



Spotts, Stevens and McCoy, inc.

- (2) steam evaporation only
- (3) a combination of solar and steam evaporation

Choice number (3) is the preferred selection in the opinion of the report writers. Final design should be based upon 800 gallons per day (GPD), average wastewater flow. The treatment system will accommodate moderately significant fluctuations in the average flow rate, easily ranging from the reported 0 to 1100 GPD.

PROCEDURES AND DISCUSSION

Six (6) test samples were prepared from the supplied samples as shown in Attachment 1. Each test sample was placed in a test pan of one (1) square foot of surface area and placed in an outdoor environment. After allowing a brief time for the water temperature to reach near equilibrium with ambient temperatures, liquid depths were measured in each pan and recorded along with time, ambient temperature, relative humidity, and estimated wind velocity. There were no periods of rain. At periodic intervals, the same types of data were again collected and recorded as in Attachment 2. The evaporation rates were then calculated for each sample as shown in Attachment 2.

Known evaporation rates for water evaporation, as shown in Attachment 3, were plotted as shown in Attachment 4. Overall evaporation rates



appear to compare favorably with those of water, which is reasonable in that the solids content is only a fraction of one percent (1%). The sample liquid evaporation rate was then plotted in Attachment 4, allowing a 25% factor of safety from the curve of water in air at a velocity of 300' per minute (approximately 3.4 mph).

Samples 4 and 5 appeared to be leaking from the test tray, subjecting the results to question, but because these results were not utilized in the plotting and were not necessarily critical as compared to Samples 1 and 6, it is believed that Samples 4 and 5 can be discarded except for general observations and comparisons.

A test piece of steel and copper tubing was placed into each test pan to observe any coating potential which could represent a problem of scale buildup on the tank walls or bottom or other surfaces within the treatment tank. Only those samples containing "scuffs" appear to be a potential problem. However, it is believed, in view of the facts that "scuff" represents only a small fraction of the total flow and that steam pipes, if employed, may be hot enough to "burn" scuff from pipe surfaces, this problem will be a very gradual problem at the worst condition. It may be necessary to periodically clean "scuff" films from vessel or piping surfaces, or, if preferable, simply replace certain sections of pipe periodically. Pipe surfaces can be scraped and cleaned rather easily.



Air samples will be drawn from an evaporating (high liquid temperature) sample to determine whether a potential air pollution problem exists. Fresh liquid samples will be used for these evaluations. Because of the urgency of this report, an addendum to this report will be made at a later time to discuss potential air problems, if any, since laboratory work involving these problems has not yet been completed.

There was a definite odor problem with the supplied samples. However, it was noted that the supplied samples were several months old, in certain cases, at least. It is probable that such odor is the result of biological attack or decay and may not result if the water wastes are treated on a current and undelayed basis at the treatment conditions. It is believed that, if odor would prove to be a problem, solution of the problem should be relatively simple and economical and further discussion of odor problems is postponed along with the air pollution addendum especially in view of the uncertainty of the existence of the odor problem, if any.

CONCEPTUAL DESIGN

Any production changes will subsequently result in changes in concentrations, chemical compositions, and flow rates of the waste waters. Such changes in waste water characteristics will significantly affect the operation of treatments employing incineration or chemical treatment. Such treatments are relatively complex in operation, costly to build,



maintain, and operate, and would require permits from regulatory agencies to operate. These permits would require time and rather substantial effort to obtain, and approval is not guaranteed.

It follows, then, that evaporation of the wastes is the preferred treatment, especially because of the relatively small quantities of waste water to be treated. On the average, quantities of waste water are 800 GPD. The system must be tolerant of rather wide flow fluctuations. Solids content of the waste water is less than originally reported, which further favors evaporation techniques. Evaporation techniques provide the greatest process flexibility and permit requirements, insofar as presently expected, are minimal, being limited to permits to haul sludges and solid wastes on an intemittent basis to a certified landfill operation.

Evaporation processes under consideration are:

- (1) solar evaporation only
- (2) steam evaporation only
- (3) a combination of solar and steam evaporation

Solar evaporation only is not recommended by the writers of this report because of the limited cold weather operation. A large amount of storage capacity would be required to enable operation for warm weather.



It must be recognized that large <u>covered</u> surface areas are required to provide enough evaporation area even for relatively small flow rates. The potential threat of odor problems is enhanced if treatment is not accomplished on a current basis.

Steam evaporation by itself is a very viable solution. However, very little effort is required to provide at least some solar evaporation in addition to the steam heat source. Because solar heat can be so easily added and will, of course, minimize steam, and thus, energy requirements, a combination of solar and steam evaporation is recommended. It is reported that steam is available on a year-round basis for treatment purposes.

Although steam heat is suggested as heat source, excluding solar heat, electric heaters could be used as an alternate to steam heat throughout this report. Attachment 5 shows steam costs and electric heater costs for comparative purposes, it is emphasized, however, that the primary reason for disqualifying electric heating sources lies with the marked increase in fire potential. If electric heaters lose contact with the liquid, which is conducting heat away from the heaters but is constantly evaporating, the heaters will rise in temperature to a point of potential damage to the heaters and, more importantly, potential fire threats. Of course, electric heating is also more expensive but does have the benefit of being more convenient and is available in case steam is not.



In order to implement a combination of solar and steam evaporation, two (2) covered pits or evaporation basins are recommended. One of these basins could be "shut down" for cleaning purposes while utilizing the other basin. The basins must be covered and curbed to exclude storm waters. The basins, if covered with a material which will permit transfer of medium or shorter "heat rays" while retaining longer "heat rays", typical of cooler heat sources such as the wastewater, will provide a "greenhouse" effect which would minimize steam consumption. It is evident that evaporation vessels must be located where sunlight is abundant. However, it must be remembered that wind velocity also affects the rate of evaporation and enough air must be provided to remove moisture from the area. Because of these ventilation requirements, it is recommended that the evaporation units be located outdoors so that natural ventilation, rather than power fans and the inherent power requirements, can be utilized. Outdoor location also avoids potential high humidity conditions inside the building which could result in building deterioration. Also, hooding would be required above the evaporation vessels if located indoors in order to prevent such building damage and to prevent "indoor rain" under certain conditions. The outdoor location is favored by the report writers for the above reasons in addition to potential odor problem and the possibility of a permit requirement for air discharges from a point source into the atmosphere. Of course, the indoor location does not permit any solar heat to augment or reduce steam heating requirements.



Recently received samples indicate that solids contents are lower than originally anticipated. Also, steel and copper sample pieces placed into the evaporation test trays have indicated that coating buildup levels are not very great. Therefore, unless actual operating experience would later dictate otherwise, it is initially recommended that steam piping be run inside the evaporation vessel in direct contact with the wastewater. Such positioning allows greater efficiencies for heat transfer when compared to providing steam heat on the vessel exterior. Depending upon final evaporation vessel size, it may be possible to use one steam pipe for both vessels. Removal of the steam pipe from the vessel may also facilitate cleaning of solids from the vessel.

The size of each evaporation vessel and piping sizes are dependent upon the desired water temperature, the amount of surplus storage capacity desired, ease of covering, ease of cleaning, and other factors. Various required sizes, based upon calculations from the test trays, are given in Attachment 5, Table 1. Recirculation of wastewater, of course, would reduce the quantities of water to be evaporated and would, therefore, require less evaporative areas. However, water quality is reportedly not sufficient for such purposes without additional treatment and additional treatment is not economically sound for the small quantities of water recoverable.



Assuming a wastewater temperature of 60°F initially, steam consumption requirements are given in Attachment 5. Steam costs are also given in this Attachment 5. It should be noted that steam flows can be reduced by utilizing higher pressure steam, say 20 psig, if so desired. Examination of the information in Attachment 5 would suggest that the water temperature be raised rather high (say 180°F or above) to evaporate the water rapidly, in light of the minimal cost differential, in one of the evaporation basins. As the other basin fills solar heat can be absorbed, at least during warm weather, in preparation for subsequent steam evaporation. Of course, during cool weather, it may be necessary to immediately heat with steam since little, if any, benefit would be available via solar heating during such times. It should be noted that steam heating allows operation during cool weather. Steam heating can best be optimized after extended periods of operation.

In order to permit ease of installation of the steam pipe above the solids, it is suggested that the pipe be inserted from the top to a position about 2" or so above the apparent bottom of the basin, or the top of the sludge, as applicable. Periodic cleaning of the tank basin or piping will be required. The solids should be rather easily removed manually by removing one of the two basins from service and utilizing the other basin for treatment. Because the basins are



relatively shallow (not to exceed 4'), the tank or basin cleaning should be facilitated. It is recommended that the evaporation vessels be constructed at depths of between 3' and 4'.

Because the basins are heated, unauthorized personnel must be restrained from the basin areas by appropriate fencing. This is an additional reason to minimize the size of the evaporation vessels. However, it is deemed appropriate to provide storage of about five (5) days of typical operation, extended to about one (1) full week (5-day operation), in the event of some unanticipated problem such as loss of the boiler, etc.

At 180°F or more, it is seen that at least 105 square feet surface area are required. However, in order to provide storage for five (5) days, assuming no evaporation, such surface area is not sufficient at a depth of 4'. Adjusting for the limiting values of five (5) days of storage would require two (2) basins each of at least 134 square feet of surface area. If the width of each basin is limited to 10' to accommodate covering, then a divided pit or basin 20' x 15' x 4' deep should provide more adequate surface area and capacity. This area would be divided into two (2) pits side-by-side each 10' x 15' x4' deep. It is seen that additional capacity can be realized, providing increased system flexibility, simply by increasing the controlled water temperature.



Rectangular shaped vessels are discussed because of greater ease of supporting vessel covers, potential greater flexibility for future vessel modifications, probable greater ease of manually cleaning sludge from the vessel, and the belief that ambient air will achieve greater water surface to air contact with a narrower vessel. However, circular tanks may be desirable from other points of view, depending upon spacing requirements. Vessels of steel or concrete can be considered.

Final design will incorporate sizes and piping layouts for the steam heating system as well as the method of supporting and selection of cover materials. If acceptable, the steam heating pipe could be manipulated from basin to basin, as appropriate, to minimize the number of traps, strainers, and other piping appurtenances. There would be condensate return from the steam heater and this condensate could be returned to the boiler, if feasible.

Rough estimated construction costs, depending upon the final system selected, are given in Attachment 6. Piping of condensate return is not included. Engineering costs, included in Attachment 6, will be virtually the same regardless of the system selected and are estimated to be \$6,000, including the costs for preparing specifications.



Attachment 7 offers conceptual sketches for installation of the treatment system. The combination system is shown but can be converted to solar evaporation only by lengthening the vessels to approximately 308' and removing the steam piping.

It is estimated that solids accumulations will be in the order of 44 pounds per day. At these rates, it is anticipated that vessel cleanings need be performed, perhaps, annually. Such solids will have to be manually removed from the evaporation vessels. Various techniques could be utilized to clean the vessels such as cleaning from the outside of the vessel using a backhoe, cleaning from inside using a front end loader, or by manual shoveling. While the steam pipes, or other heat transfer surfaces, should be kept rather clean, it is not necessary to keep the vessel surfaces ultra-clean, but, rather to remove gross solids accumulations from the evaporation vessels only. Steam pipes, or other heat transfer surfaces, should be examined for films or coatings weekly, at least initially, and kept clean as required. While it would require much longer vessels to permit front end loaders to drive into the vessel, it is feasible to lift a small front end loader into the vessel for cleaning purposes on an infrequent basis, but it is recognized that partial cleaning of the vessel must be accomplished to make room for loader entrance. In order to drive a vehicle into the vessel, slopes should be limited to 5% maximum.



Lengthening the vessels well beyond that required for treatment for the primary purpose of cleaning is possible but not recommended by the writers because of the added costs of construction and the infrequent cleaning requirement expected.



APPENDIX



Spotts, Stevens and McCoy, inc.

ATTACHMENT 1

SAMPLE COMPOSITION AND IDENTIFICATION

SAMPLE NO.	IDENTIFICATION	APPROX. % VOL.	SOURCE	APPROX. SUB % VOL.	CONSTITUENTS
1	Total composite	44.19 17.44 23.26 5.81	line #6 washwater processing sink line #6 bootle washer manufacturing tank	•	
			liquid room	7.98 63.38 2.42	sneaker saver white cleaner base I
		3.49	#3 filler	0.07 26.15 11.39	desal er emulsion neutral deluxe white creme
		3.49	cavalier platform	88.61 10.79	shoe creme saddle soap
		3.43	cararrer praction	73.52 15.70	shoe creme deluxe white creme
		1.16	storage tank	41.31 46.13 8.55	liquids scuffs leather dye
		1.16	manufacturing tank	4.00	heel and sole
		1.10	building #2	38.64 61.36	sneaker shampo patent and viny
2 3 4	Processing sink Line #6 #6 Bottle washer				
5,6	Partial composite	52.05 20.55	line #6 washwater processing sink		
		27.40	line #6 bottle washer		#6 use white cleanou #5 use black scuff

DATA FROM EVAPORATION TESTS, INCLUDING CALCULATIONS

(test box 1 sq. ft. surface area)

DATE	TEMP. °F.	R.H. %	EAST WIND VEL. MPH	SAMPLE #	TIME	DEPTH INCHES	▲ DEPTH INCHES	△DEPTH GALLONS	△ TIME DAYS	EVAP. RATE GPD sq.ft.	
5/8/79	85	54	3 - 4	1	3:12pm	1.9					
				2	3:13pm	1.9					
				3	3:14pm	2.2					
				4	3:14pm	1.6					
				5	3:15pm	1.1					
				6.	3:16pm	2.1		<i>-</i> -			
5/9/79	69	77	3 - 4	ĭ	8:16am	1 1/8	0.775	0.483	0.711	0.679	
			•	2	8:16am	1 1/4	0.650	0.405	0.710	0.570	
				3	8:16am	i	1.200	0.748	0.710	1.054	
				4	8:16am	7/8	0.725	0.452	0.710	0.637	
			•	5	8:16am	1/2	0.600	0.374	0.709	0.528	
				6	8:17am	i' -	1.100	0.686	0.709	0.967	
5/9/79	84	45	3 - 4	ì	1:21pm	1 1/8	0	0	0.212	0	•
				2	1:21pm	1 3/8	0.125	0.078	0.212	0.368	
				3	1:22pm	7/8	0.125	0.078	0.213	0.367	
				4	1:22pm	3/4	0.125	0.078	. 0.213	0.367	
				5	1:22pm	nil	0.500	0.312	0.213	1.468	
				6	1:23pm	1	0	0	0.213	0	
5/9/79	89	34	3 - 4	1	4:37pm	15/16	0.1875	0.717	0.136	0.859	
				2	4:38pm	1	0.375	0.234	0.137	1.709	
				3	4:37pm	5/8	0.250	0.156	0.135	1.151	
				4	4:38pm	1/4	0.500	0.312	0.136	2.290	
				5	4:38pm	nil					
				6	4:38pm	15/16	0.0625	0.039	0.135	0.288	
OVERALL	75	65	3 - 4	1	- - '		0.9625	0.6000	1.0590	0.5666	
AVERAGE	(from	(from		2			0.9000	0.5611	1.0590	0.5298	
	chart)	chart)		3			1.5750	0.9819	1.0576	0.9284	
				4			1.3500	0.8416	1.0583	0.7952	
				5			1.1000	0.6858	0.9215	0.7442	
				6			1.1625	0.7247	1.0569	0.6857	

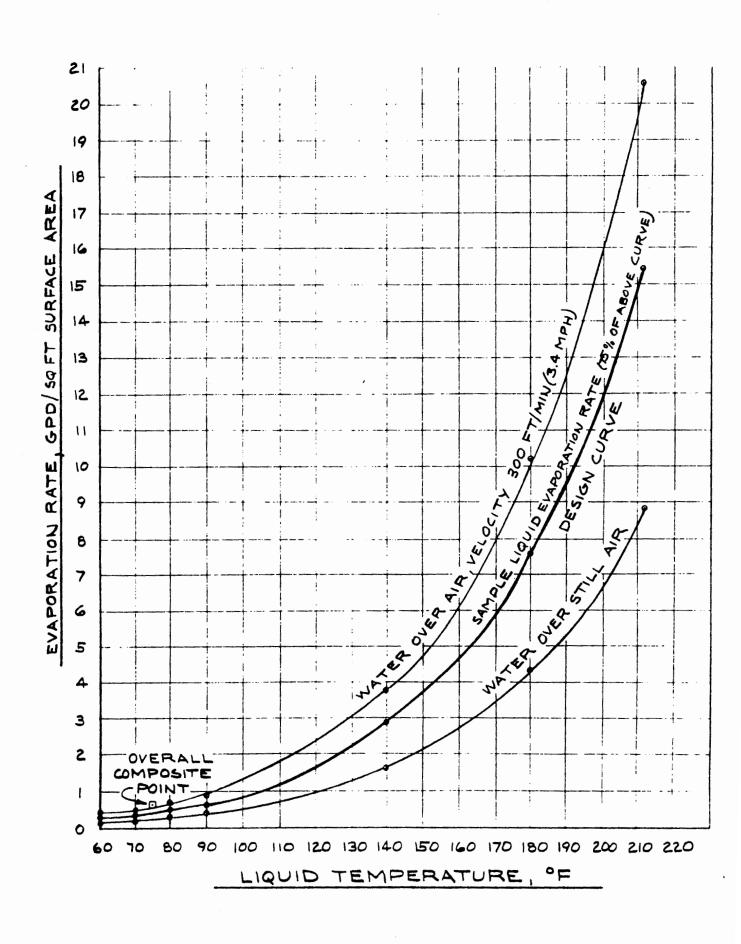
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ATTACHMENT 3

ESTIMATED EVAPORATION RATES FOR WATER AT VARIOUS TEMPERATURES (in GPD/sq. ft. surface area)

Water temp.	60F	70F	80F	90F	140F	180F	212F
Still air	0.12	0.20	0.26	0.35	1.61	4.30	8.85
Vel. 300 fpm (approx. 3.4 mph)	0.35	0.49	0.66	0.90	3.74	10.17	20.56

ESTIMATED EVAPORATION RATES AT VARIOUS LIQUID TEMPERATURE



ATTACHMENT 5

CALCULATIONS

TABLE 1

Flow 800 GPD, 60F 0.65% solids (44 PPD solids, 6624 PPD water) 1 day = 24 hours steam source @15 psig, sat., 250F, 945.6 btu/#

evap. rate, with factor of safety GPD 50 ft 0.26 0.36 0.49 0.67 2.80 7.62	15.42
*A**++ V.(U V.3U V.47 V.U/ /.OU /.O/	
sq.ft 0.26 0.36 0.49 0.67 2.80 7.62 approx. surface area needed, sq.ft. 3080 2225 1635 1195 290 105	55
volume of container, cu.ft. 02' depth 6160 4450 3270 2390 580 210	110
03' depth 9240 6675 4905 3585 870 315	165
@4' depth 12320 8900 6540 4780 1160 420	220
volume of container, gal. @2' depth 46080 33290 24460 17880 4340 1570	820
03' depth 69125 49935 36695 26820 6510 2355	1235
04' depth 92165 66580 48925 35760 8680 3140	1645 5
days of storage (no evap.) @2' depth 57.6 41.6 30.5 22.3 5.4 1.9	1.0
03' depth 86.4 62.4 45.8 33.5 8.1 2.9	1.5
04' depth 115.2 83.2 61.1 44.7 10.8 3.9	2.0
sensible heat (wastewater at 60F)btu/day 0 66240 132480 198720 529920 794880	1006848
latent heat, btu/# 1060 1053 1048 1043 1014 990	970
latent heat, btu/day (millions) 7.0214 6.9751 6.9420 6.9088 6.7167 6.5578	6.4253 7.4321
total heat, btu/day (millions) 7.0214 7.0413 7.0744 7.1076 7.2467 7.3526 steam consumption, #/day (no heat loss) 7425 7446 7481 7516 7664 7776	7.4321 7860
(no solar heat)	7000
steam costs, \$/day @\$2.50/1000 #steam 18.56 18.62 18.70 18.79 19.16 19.44	19.65
@\$2.60/1000 #steam 19.31 19.36 19.45 19.54 19.93 20.22	20.44
@\$2.75/1000 #steam 20.42 20.48 20.57 20.67 21.08 21.38	21.62
@\$3.00/1000 #steam 22.28 22.34 22.44 22.55 22.99 23.33	23.58
electric heater, kw (100% efficiency) 85.7 86.0 86.4 86.8 88.5 89.8	90.7
(no solar heat)	
electric costs, \$/day @3¢/kwh 61.72 61.89 62.18 62.48 63.70 64.63	65.33
04¢/kwh 82.29 82.52 82.91 83.30 84.93 86.17	87.10
@5¢/kwh 102.86 103.15 103.64 104.13 106.16 107.71	108.88
@6¢/kwh 123.44 123.78 124.37 124.95 127.40 129.26	130.66

ATTACHMENT 6

ESTIMATED CONSTRUCTION COSTS

All estimated construction costs listed below are for budget purposes only. Until final design has been completed and details of the design have been verified (such as pickup and ending points for the piping) more accurate cost estimates are questionable. Various options are available which will reflect altered cost estimates. For example, concrete evaporation vessels are assumed although steel vessels could also be used.

It is assumed that the costs for constructing steam heat alone and for constructing steam and solar heat combined will essentially be the same. The basic components for each of these treatment techniques are virtually identical with the primary difference being the material selection for the cover. Differences in supporting the pit cover will, for all practical purposes, equalize the installed cost of the pit cover regardless of the treatment technique employed, escapt if solar evaporation alone is used.

It must also be borne in mind that odor problems, if real, will be greater if the wastes are not treated on a current basis. Therefore, the odor threat is greater if solar evaporation alone is utilized, resulting in probable greater future costs for resolution of such odor problem. Such future costs are not considered herewith.

Combination Treatment (Steam and Solar)		Dollar Amount
Basin construction and installation (based on 11 days total retention) Piping including regulators, insulation	tuan stuainous	\$ 9,000.00
etc steam	i, trap, strainers,	6,000.00
Pump and piping for waste		4,000.00
Cover for pit		5,000.00
Engineering		6,000.00
	TOTAL	\$30,000.00
Solar Heat Only		
Basin construction and installation		
(based on 230 days total retention)		\$55,000.00
Pump and piping for waste		2,000.00
Cover for pit		33,000.00
Engineering	TOTAL	6,000.00
	TOTAL	\$96,000.00

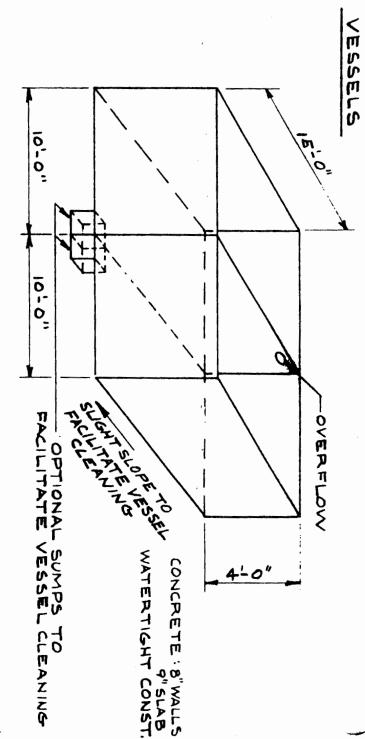
Costs Used

Concrete: slab \$150 per cu. yd.

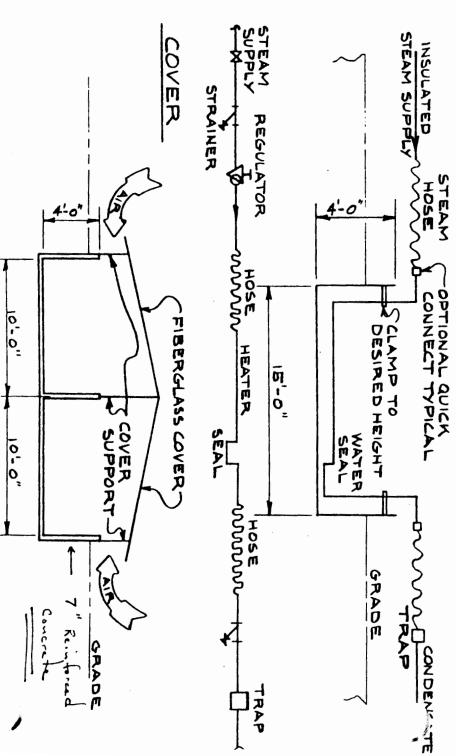
walls \$200 per cu. yd.

Excavation: \$10 per cu. yd. Pit cover: \$5 per sq. ft.

ATTACHMENT 7 CONCEPTUAL SKETCHES COMBINATION TREATMENT SHOWN NOT TO SCALE



PIPING (STEAM ONLY SHOWN: WASTE といと ALSO ØF PIPED 7 VESSELS)



CAN BE LOCATED
PREFERRED IF S
CLEANING MUST I INGULATION. HOWA 760 HOWAVAR, BY STERE TANKS ARE SELECTED.

ALSO BE CONSIDERED IN THE PAINING GRADE BUT VESSEL HIM 10 TAKE ADVANTAGE OF COVER ELEVATION, T THE METHOD OF VI 0 11 ON VERSOR THE V



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS PHILADELPHIA. PENNSYLVANIA 19106

October 14, 1981

Mr. W. W. Jamison Kiwi Polish Co. - USA Division Route 662 North Douglassville, PA 19518

Re: EPA I.D. No. PAD 09 715 3399

Dear Mr. Jamison:

This is to acknowledge receipt of your letter dated <u>October 2, 1981</u> in which you request a change to "Conditions of Operations During Interim Status."

Enclosed is an amended form reflecting the change(s). If we can be of any further assistance, please do not hesitate to contact Ms. Joan Henry, a member of my staff, on 215-597-8751.

Sincerely yours,

Shirley D. Bulkin

Chief, RCPA Administrative Support Section

Permit Enforcement Branch

Enclosure

CONDITIONS OF OPERATION DURING INTERIM STATUS

AMENDED

Date Prepared: October 14, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

1. Facility name, location, and EPA Identification Number.

Name: The Kiwi Polish Co. - USA Division

Location: Route 662 North

Douglassville, PA 19518

EPA I.D. No.: PAD 09 715 3399

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Kiwi Polish Co.

Attn: Mr. W. W. Jamison - Vice Pres. of Mfg.

Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

PROCESS	DESIGN CAPACITY
S02	9,000 Gals.
T01	800 Gals/Day

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

D009	. ` ——			•	 	
	,	•				
						• .

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

9 April 1986

Mr. Thomas Voltaggio Acting Director, Enforcement Division U.S. Environmental Protection Agency Region III 6th and Walnut Streets Philadelphia, Pennsylvania 19106

REFERENCE: PAD097153399

Dear Mr. Voltaggio:

Please find enclosed a letter to the PA Department of Environmental Resources requesting delisting of our concrete evaporative tank from being a hazardous operation. In addition to the letter mentioned above, there are laboratory analyses to support this position as well as a change of notification of hazard activity as required by the D.E.R.

If you have any questions, please contact me.

Yours truly,

Peter A. Burke, Ph.D.

Laboratory Manager

js

Commonwealth of Pennsylvania Department of Environmental Resources P. O. Box 2063 Harrisburg, PA 17120

Enc:

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 - PHONE: (215) 385-3041 - CABLES: KIWI DOUGLASSVILLE - TELEX: 846384 - FAX: (215) 385-6177

8 April 1986

Division of Hazardous Waste Management Bureau of Solid Waste Management Commonwealth of Pennsylvania Department of Environmental Resources P. O. Box 2063 Harrisburg, Pennsylvania 17120

REFERENCE: PAD097153399

Gentlemen:

Since our initial filing as storer/treater of hazardous waste in a concrete evaporative tank, changes in our manufacturing operation have caused the material to become non-hazardous. The only hazard associated with the original sludge was the accumulation of an organo-metallic compound which was EP toxic due to the presence of mercury. Analysis of the waste stream during the course of operation demonstrate that the waste was never EP toxic since the EP toxic leachate demonstrated less than .2 ppm. Nevertheless, we have continued to manifest the waste as hazardous as a conservative position in accordance with the RCRA regulations. Reformulation of our products has eliminated this organo-mercuric compound and, therefore, this sludge no longer constitutes EP toxic waste.

To support this position, please find enclosed copies of recent laboratory analyses of the sludge in the concrete evaporative tank demonstrating no EP toxic mercury.

In due course we hope to hear from you indicating a delisting of our facility as being a hazardous storer/treater.

Additionally, within the last year, our company name has been changed from The Kiwi Polish Company Pty. Ltd. to Kiwi Brands Inc.

Department of Environmental Resources Page 2 ... 8 April 1986

Thank you in advance for your cooperation.

Yours truly,

Peter A. Burke, Ph.D. Laboratory Manager

js

cc: M. G. Maiolie
PA Department of Environmental Resources
625 Cherry Street
Reading, PA 19602

Mr. Thomas Voltaggio
Acting Director, Enforcement Division
U.S.E.P.A.
Region III
6th and Walnut Streets
Phila., PA 19106

ER-SWM-53: Rev. 3/82

BUREAU OF SOLID WASTE MANAGEMENT NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NUMBER	in facilities in the contract of the contract	在特别的时间中心的变形。
LA DO 9 71 5 3 3 9 9		
II NAME OF INSTALLATION	the state of the state of	Markovici (1888) - Baltovici of a roda
KIWI BRANDS INC		<u> </u>
III INSTALLATION MAILING ADDRESS	以他们在自己的 在2000年	BARROLD ARMED TO MARK HOLD A TO SE
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Route 662 North		
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Douglassville		PA 19518
		和他们是自己的情况 来的特别的证明。
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Route 662 North		Douglassville
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Douglassville	PA 19518	Berks
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P. A. Burke, Laboratory Manager		21513851304
		The first of the second of the
MAKET SELECT OF STATES COMPANY SELECTION A. HAME OF MISTAL	LLATION'S LEGAL OWNER	The state of the s
Kiwi Brands Inc.		
B. TYPE OF OWNERSHIP		
(enter the appropriate letter into box) F = FEDERAL M = NON-FEDERAL M		
VII SIC CODES (4-digit in order of priority)	William Co.	医多多形式 的复数人名英格兰人姓氏
A. FIRST		C. THIRD
(specify) NONE	(apecify)	NONE
B. SECOND	(specify)	D. FOURTH
NONE	to develope the	NONE
VIIL TYPE OF HAZARDOUS WASTE ACTIVITY A. GENERATION C. STORE	TRANSPORTATION	
	(COMPLETE ITEM IX)	G. REUSE, RECYCLE, RECLAIM
D. DISPOSE	PERMIT BY RULE	NONE
IX MODE OF TRANSPORTATION (transporters only)	na na managana ya kata ya	and the second properties of the second proper
A. AIR B. RAIL . C. HIGHWAY D.	WATER . C. OTHER	(specify):
X EXISTING ENVIRONMENTAL PROGRAM PERMITS	STATE OF THE PARTY	Company of the Control of the Contro
A. NPDES (Discharges to Surface Water) D. PSD (Air Emissions fro.	m Proposed Sources/	
8. UIC (Underground Injection of Fluids) E. SQLID	WASTE	
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C: RCRA (Hazardous Wastes) F. OTH	ER	(specify)
	NON	E - Just E.P.A. ID.
I. TYPE OF NOTIFICATION,	The Annal Trends of St	
Mark "X" in appropriate box to indicate whether this is your installat	ion's first notification of haz	ardous waste activity, or notification of a chance
general information, hazardous waste handled, of hazardous waste activity.	If you check B, C, D, E, or	F, attach a letter of explanation (SEE INSTRU
A. FIRST NOTIFICATION . C. DELETIO	N OF A WASTE	E. DELETION OF AN ACTIVITY
🗷 B. CHANGE OF GENERAL INFORMATION 🔲 D. ADDITION	N OF A WASTE	F. ADDITION OF AN ACTIVITY

F. ADDITION OF AN ACTIVITY

Environmental Chemistry Laboratory, Fricks Lock Rd., RD #1, Pottstown, PA 19464 (215) 326-9662

CERTIFICATE OF ANALYSIS

See Below LABORATORY NO:

BECEIVED: 24 Sep 1985

REPORTED: 31 Oct 1985

CLIENT:

Kiwi Brands, Inc.

Route 662 North

Douglassville, PA 19518 Sample Date: 8/29/85 and 9/24/85

Sampled By: John Hughes

SAMPLE DESCRIPTION:

	Total Analysis*				E.P. Toxicity	Leachate Anal	ysis	
Paramèter	Units	9-24-85-N-SP RMC#2522-85	9-24-85-N RMC#2523-85	8-29-85-S RMC#2524-85	Units	9-24-85-N-SP RMC#2522-85	9-24-85-N RMC#2523-85	8-29/85-S RMC#2524-85
Mercury, Total	mg/kg	515	0.20	0.60	mg/l	20	0.004	0.012

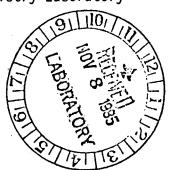
*As Received

Approved By:

Environmental Chemistry Laboratory

= North Pit = South Pit = Spiked

Sample 9-24-85-N-SP - same as 9-24-85-N only spiked with approximately 500 ppm Hg (Troysan).



Lie

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 @ PHONE: (215) 385-3041 - CABLES: KIWI DOUGLASSVILLE @ TELEX: 846384 @ FAX: (215) 385-6177

7 May 1986

Division of Hazardous Waste Management Bureau of Solid Waste Management Commonwealth of Pennsylvania Department of Environmental Resources P. O. Box 2063 Harrisburg, Pennsylvania 17120

REFERENCE: PAD097153399

Gentlemen:

In reviewing our letter of 8 April 1986 requesting a change in hazardous waste status by requesting our facility be declassified as storer of hazardous waste, we have noted than an error was committed in finalizing the Notification of Hazardous Waste Activity form.

To be specific, in description of hazardous waste, Section 12, Part A, our activities were listed as none. This is not entirely correct since we do generate some hazardous wastes which are designated by EPA code F001 and F005 as well as ignitable materials. However, these materials are not stored nor treated but are merely generated and properly disposed of within the permissible 90-day period. Therefore, would you please update our file with the enclosed Notification of Hazardous Waste Activity form which has the specific listings.

Yours truly,

Peter A. Burke, Ph.D. Laboratory Manager

js

cc:

Mr. G. Maiolie PA Dept. of Env. Resources 625 Cherry St. Reading, PA 19602 Mr. Thomas Voltaggio Acting Director U.S.E.P.A. Region III 6th and Walnut Streets Phila., PA 19106

BUREAU OF SCLID WASTE MANAGEMENT NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

_1A D0 9 71 5 3 39 9	
II NAME OF INSTALLATION	the property of the second
Kiwi Brands Inc.	
III INSTALLATION MAILING ADDRESS	
STREET OR P. O. BOX	
Route 662 North	ST. ZIP CODE
# This is the State of the CITY OR TOWN 1 - 新文学 (本語) (本語) (本語) (本語) (本語) (本語) (本語) (本語)	
Douglassville	PA 19518
IV LOCATION OF INSTALLATION STREET OR ROUTE NUMBER	A STATE OF THE PROPERTY OF THE
Route 662 North	ZIP CODE COUNTY
Douglassville PA	19518 Berks
V INSTALLATION CONTACT	
MAME AND TITLE (last, first, & job title)	
P.A. Burke, Laboratory Manager	2 1 5 3 8 5 3 0
VI OWNERSHIP	
A. HAME OF INSTALLATION	
Kiwi Brands Inc.	
B. TYPE OF OWNERSHIP	
(enter the appropriate letter into box)	
F - FEDERAL M - NON-FEDERAL M	시키하는 이번에서 하는 이 기계를 하는 것이 되는 것이다. 네트리트 이 기계를 하는데 그렇게 되는 것이다.
VII SIC CODES (4-digit in order of priority)	The state of the s
A. FIRST	C, THIRD CONTROL CONTR
(specify) None	(specify) None
B. SECOND	D. FOURTH 1 34 1 H
(specify) None	(specify) None
VIIL TYPE OF HAZARDOUS WASTE ACTIVITY	的复数形式 经收入证券 医二种二种 经分子 医二
X A. GENERATION C. STORE B. TRANSPO	ORTATION G. REUSE, RECYCLE, RECLAIM
b. TREAT D. DISPOSE F. PERMIT	하는 아이는 아는 사람들은 아이를 하는 것이 없는 것이 없는 것이 없는 것이 없는 것이 없는 것이 없다면
IX MODE OF TRANSPORTATION (transporters only)	Appropriate the second of the
A. AIR B. RAIL C. HIGHWAY D. WATER	E. OTHER (specify):
X EXISTING ENVIRONMENTAL PROGRAM PERMITS	(Alexandrian production) and the contraction of the
A. NPDES (Discharges to Surface Water) D. PSD (Air Emissions from Propose	d Sources.
B. UIC (Underground Injection of Fluids) E. SOLID WASTE	
C: RCRA (Hazardous Wastes) F. OTHER	(specify)
	None - Just EPA ID No.
I. TYPE OF NOTIFICATION,	
Mark "X" in appropriate box to indicate whether this is your installation's first	notification of hazardous waste activity, or notification of a change
general information, hazardous waste handled, of hazardous waste activity. If you ch TIONS).	neck B, C, D, E, or F, attach a letter of explanation (SEE INSTRU
A. FIRST NOTIFICATION X C. DELETION OF A W.	ASTE E. DELETION OF AN ACTIVITY
B. CHANGE OF GENERAL INFORMATION D. ADDITION OF A W.	ASTE F. ADDITION OF AN ACTIVITY

XII DESCRIPTION OF HAZARDOUS WASTES (Continued from front)	Aug Strafes			
4. HAZARDOUS WASTES FROM NON—SPECIFIC SOURCES. Enter the four- from non-specific sources your installation handles. Use additional sheets if no		5.261(h)(2) fo	or each listed hazard	ous west?
F 00 1 F 00 5 F 00 5 9	10	11	12	
B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit in	umber from \$75.261(h)	(3) sech listed	hezardous waste from	n specific
. Industrial sources your installation handles. Use additional shorts if necessary.				
	<u> </u>	17		
		23	24 ·	
26 26 27 11 11 11 11 11 11 11 11 11 11 11 11 11	28	29	30	
C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the for your installation handles which may be a hazardous waste. Use additional sheet		\$75.261(h)(4)	for each chemical su	betance
31 32 33 J	34	35	3 6	
37 38 39	40	41	42	
43 44 11 11	46	47	48	
D. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" (hazardous wastes your installation handles. (See \$75.261(g)(2) through (5))	in the boxes correspond	ing to the chara	cteristics of non-lis	ted
	3. REACT	VE	☐ 4. EP TO	XIC ,
XIII CERTIFICATION				
I certify under penalty of law that I have personally examined and attached documents, and that based on my inquiry of those individ I believe that the submitted information is true, accurate, and consubmitting false information, including the possibility of fine and	d am famillar with a luals immediately re mplete. I am awai i imprisonment.	the informati sponsible for e that there	on submitted in r obtaining the are significant p	this and all information enalties tor
P.A. Bur	FICIAL TITLE (Type of tke ory Manager	r Print)	DATE SI	GNED 1 6
FOR OFFICIAL USE ONLY				1. 16.

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 A PHONE: (215) 385-3041 A CABLES: KIWI DOUGLASSVILLE A TELEX: 846384 A FAX: (215) 385-6177

4 June 1986

Mr. Samuel Israel
Hazardous Waste Management Division
U.S.E.P.A., Region III
841 Chestnut Building
Philadelphia, PA 19107

REFERENCES: Telephone Conversation on 3 June 1986

Letter from Patrick R. Anderson, received 30 May 1986

Dear Mr. Israel:

This is to confirm our conversation of 3 June 1986 concerning our requirements at Kiwi Brands Inc. to

- 1) redefine as non-hazardous under RCRA the sludge collected in our concrete evaporating tanks, and
- 2) comply with the 24 April 1986 letter from Stephen Wassersug of the EPA regarding sections 3004(u) and 3008(h) of the Hazardous and Solid Waste Amendments of 1984.

My understanding from our conversation regarding our evaporating tank sludge is that this is not a listed waste stream and, therefore, the delisting process is not pertinent. Rather, our non-listed waste stream fell under a Subpart C general characteristic; i.e., E.P. Toxicity for Mercury. We eliminated the mercurial preservative totally from our manufacturing operation about one year ago.

Your recommendation was for us to continue pursuing a redefining of our sludge as non-hazardous with the Solid Waste Department of DER, a process we initiated on 8 April 1986. We will continue to do so and, as you stated, this may require an administrative closure of the unit.

Mr. Samuel Israel 4 June 1986 Page 2

With regard to Mr. Wassersug's letter regarding the Hazardous and Solid Waste Amendments of 1984, we provided a response on 7 May 1986 which included copies of our correspondence with DER regarding the desire to change to non-hazardous status the evaporating tank sludge and was accompanied with supporting analytical data. During our conversation, you stated that our response was satisfactory and no additional information was required at this point unless we are later notified to do so.

I hope that this summary is an accurate account of where we stand regarding our present obligations as well as an indication of the future steps that Kiwi should pursue relevant to our evaporating tank sludge.

Very truly yours,

ERS

EDWARD R. STRAUCH, JR. Senior Analytical Chemist

ERS/ep

cc: Patrick R. Anderson, Chief Pennsylvania Section Waste Management Branch U.S.E.P.A., Region III 841 Chestnut Building Philadelphia, PA 19107

M.G. Maiolie
PA Department of Environmental Resources
625 Cherry Street
Reading, PA 19602

PA 15/16

8

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

30 July 1986

Mr. James Dolan
Department of Environmental Resources
520 E. Broad Street
Bethlehem, PA 18018

Dear Mr. Dolan:

Pursuant to your conversation with Mr. Edward R. Strauch, our Senior Analytical Chemist, I am providing the necessary documentation for administrative closure of our evaporative concrete tanks which are no longer hazardous due to the removal of a mercurial biocide from our product line. The following steps have been taken to provide the necessary data and documentation for your review.

- 1. On 7 July 1986 Delaware Container Corporation completely removed the aqueous sludge from both the collection and evaporative tanks. During this clean-out procedure, the following actions were taken:
 - a. Both the collection and evaporative tanks were triple rinsed to insure no trace mercurial materials were adhering to the concrete or metal walls.
 - b. While the tanks were completely empty, the walls and bottoms were inspected for structural faults. No significant structural defects were sighted.
- 2. Three samples were taken from the third rinse specifically from the collection tank as well as the north and south side of the evaporative tanks. Provided for your review is a report from RMC Environmental Services indicating the absence of mercury. It is reported at less than .02 milligrams per liter of leachable mercury since this is the lower limits of their detection capabilities.

Mr. James Dolan Page 2 30 July 1986

Therefore, I am requesting that you review the attached information for purposes of administrative closure and, if you require additional information prior to granting closure, please contact me.

While we are requesting administrative closure, you should be cognizant of the fact that although no hazardous materials are present in the aqueous sludge, we are still disposing of these materials through E. I. DuPont which was our practice while the sludge contained a mercury content.

Yours truly,

Peter A. Burke, Ph.D. Laboratory Manager

js

Attach:

cc:

E. R. Strauch

CERTIFICATE OF ANALYSIS

LABORATORY NO: See below

RECEIVED: 7/8/86

REPORTED: 7/21/86

CLIENT: KIWI

01d Swede Road

Douglassville, PA 19518

SAMPLE DESCRIPTION: EP Tox Leachate

Parameter	Units	RMC# 2045-86 3rd Rinse South Side	RMC# 2046-86 3rd Rinse North Side	RMC# 2047-86 3rd Rinse Collection Tank
Total, Mercury	mg/l	<0.02	<0.02	<0.02

Approved By:

Kyle F. Gross

Laboratory Supervisor Environmental Chemistry Laboratory

KIWI BRANDS INC.



RT. 662 NORTH. DOUGLASSVILLE, PA 19518 PHONE: (215) 385-3041 CABLES: KIWI DOUGLASSVILLE TELEX: 846384 FAX: (215) 385-6177

20 June 1986

Mr. Michael G. Maiolie PA Department of Environmental Resources 625 Cherry Street Reading, PA 19602

Dear Mr. Maiolie:

As we agreed upon during our telephone conversation on 19 June 1986, Kiwi will soon construct a third concrete evaporating tank in addition to the two existing concrete evaporating tanks and an overflow tank. This new evaporating tank will not be put into use until we have received an answer from DER concerning the administrative closure of the two existing evaporating tanks, arrangements for which are already underway.

Please contact me if you should have any comments or questions.

Very truly yours,

EKS

EDWARD R. STRAUCH, JR. Senior Analytical Chemist

ERS/ep

Liste -

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 - PHONE: (215) 385-3041 + CABLES: KIWI DOUGLASSVILLE + TELEX: 846384 + FAX: (215) 385-6177

£.le

21 August 1986

Mr. Michael G. Maiolie
PA Department of Environmental Resources
625 Cherry Street
Reading, PA 19602

Dear Mr. Maiolie:

As per your request during your 19 August inspection, a sample of the one-half to one inch rainwater in the overflow concrete tank at Kiwi Brands Inc. was collected and sent out for mercury analysis. Attached is a copy of the results forwarded to us on 20 August 1986 by RMC Environmental Services of Pottstown.

Should you have further questions or need additional information, please contact me.

Sincerely yours,

ERS

EDWARD R. STRAUCH, JR. Senior Analytical Chemist

ERS/ep

Attachment



Environmental Chemistry Laboratory, Fricks Lock Rd., RD # 1, Pottstown, PA 19464 (215) 326-9662

CERTIFICATE OF ANALYSIS

LABORATORY NO: 2510-86

RECEIVED: 8/19/86

REPORTED:

8/20/86

CLIENT:

KIWI

01d Swede Road

Douglassville, PA 19518

Sample Date: 8

8/19/86

Sampled By:

Client

SAMPLE DESCRIPTION:

Overflow Tank

Parameter

Units

Sample Concentration

Mercury, Total

mg/1

0.08

Approved By:

(yle F. Gross, Supervisor

Environmental Chemistry Laboratory



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Reading District Office 625 Cherry Street Reading, Pennsylvania 19602 215-378-4175

September 10, 1986

Kiwi Brands Inc. Attention: Peter A Burke, Ph.D. Route 662, North

Douglassville, PA 19518

Re: Closure Plan for Facility

PAD 097153399

Amity Township, Berks County

Dear Mr. Burke:

The Department received a hazardous waste closure plan for your facility on July 30, 1986, to remove a collection tank, two evaporator tanks and the overflow tank adjacent to the two evaporator tanks from the hazardous waste system. On August 19, 1986, an inspection of the above referenced units was conducted and it was determined that an additional sample should be collected from your overflow tank. This analysis dated August 21, 1986, along with the previously submitted analyses, confirm that the tanks have been adequately decontaminated.

This letter is to approve the closure plan and related closure activities which have already occurred at your facility. Once the closure certification forms have been received at this office, closure of the above referenced units will be considered complete. If you have any other questions concerning this matter, please feel free to contact me at the above number.

Very truly yours,

MICHAEL MAIOLIE

Waste Management Specialist

cc: Norristown Regional Office Reading District Office



KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 - PHONE: (215) 385-3041 - CABLES: KIWI DOUGLASSVILLE - TELEX: 846384 - FAX: (215) 385-6177

18 September 1986

Mr. Michael Maiolie Waste Management Specialist DEPARTMENT OF ENVIRONMENTAL RESOURCES 625 Cherry Street Reading, PA 19602

Dear Mr. Maiolie:

We have received your letter of 10 September 1986 approving our closure plan for a collection tank, two evaporator tanks, and the overflow tank adjacent to the two evaporating tanks. Enclosed are the following completed closure certification forms:

- 1) Professional Engineer Certification of Closure
- 2) Owner or Operator Certification of Closure

With the completion of these forms, it is our understanding that the administrative closure for the units is now complete.

Very truly yours,

EDWARD R. STRAUCH, JR.

Senior Analytical Chemist

ERS/ep

Enclosures

PROFESSIONAL ENGINEER CERTIFICATION OF CLOSURE

I, JOHN JOSEPH ORANSKY	, a Professional Engineer registered
(Name)	
pursuant to the Professional Engineers Re	egistration Law, 63 P.S. \$\$148 et seq., hereby
certify that I have reviewed the Closure	Plan for the STORAGE FACILITY at
	(Type of Facility)
KINI BRANDS INC.	("facility"), located
(Name of Hazardous Waste	Facility)
at ROUTE 662 NEATH DOUGLA	
	Location)
that I am familiar with the rules and reg	llations of the Pennsylvania Department of
Environmental Resources pertaining to c	losure of such facility, and that I personally have
made visual inspection(s) of the aforement	ntioned facility, and that the closure of the
	ned in full and complete accordance with the
facility's closure plan approved in writing	by the Department of Environmental Resources or
<u>September 10</u> , 1986, an	d the rules and regulations of the Department
codified at 25 Pa. Code Chapter 75.	
John Joseph Oranahy (Signature)	SEPT. 10, 1986
(Signature)	(Date)
, tagains 2, 5	NWEAR
027849-E	Salva Caracionary Maria
(Professional Engineering License N	umber) S JOHN JOSEPH ORANSKY
•	ENGINEER
SPOTIS, STEVENS + MC CO	Y, INC. 100.027849-E
•	
(Business Address)	30x 6307
(Business Address)	(Seal)
115-77/-/561	·
215-376-6581	
(Telephone Number)	

OWNER OR OPERATOR CERTIFICATION OF CLOSURE

The undersigned,	Kiwi Br	ands Inc.	, a (1) Corporation,
incorporated under the laws in the	State of Pe	nnsylvania a	nd licensed to do business in
Pennsylvania, or (2)		•	,
(Partne	ership, Individ	dual, Municipality	y or Other Entity)
with its principal place of busines	s at Route	662 North, Do (Addre	ouglassville , which
formerly owned or operated a haz	ardous waste	storage fac	ility Hazardous Waste Activity)
(hereinafter "Facility") known as	Kiwi Bran	ds Inc.	and
	(Name of	Hazardous Waste	e racility)
located at Route 662 North,	Douglassy	ille	
		(Location)	
in Berks County, Pen active operation of the facility ar closure of the facility as set forth Department of Environmental Research	nd has fully in In the Closu	mplemented all n ire Plan approved	
NOW, THEREFORE, I	(we) Kiwi	Brands Inc.	
1 1	•	(Name of Ov	vner/Operator)
hereby swear and affirm that the accordance with the facility's Clo 10 September , 1986, that	osure Plan ap all measures	proved in writing relating to the c	by the Department on losure of the facility required
by the Closure Plan and the rules Chapter 75 have been fully imple violations continue to exist that r	and regulation mented, and	ons of the Depart that to the best (tment codified at 25 Pa. Code of my (our) knowledge, no
Carlin As Furis (Signature)		_	•
(Signature)			\$
Vice President - Finance (Title)			
(Title)			•
Route 662 North, Douglass (Address)	sville, PA	19518	
Taken, sworn and subscribed before		62	
Doult Regall		<u>~</u>	
(Notary)			
BANGELL HOLATY Public			
DAVID R. MAGILL, bout of Douglassville, Berks County Douglassville, Berks County My Commission Expires Aug. 29, 1987			



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bethlehem Office
520 East Broad Street
Bethlehem, PA 18018
861-2070
August 4, 1986
Closure Plan for Facility
PAD097153399

PAD097153399

Berks County

Mr. Peter A. Burke, Ph.D. Laboratory Manager Kiwi Brands Inc. Route 662 North Douglassville, PA 19518

Dear Dr. Burke:

This is to acknowledge receipt of your closure plan dated July 30, 1986 for the referenced facility. Since closures for facilities that are classified as "generator only" do not require public notification, it is the responsibility of the Waste Management Specialist, who inspects your facility, to review and follow through on these closures. Therefore, Michael Maiolie of our Reading District Office will be your contact for this closure and all activity and correspondence may be directed through Mr. Maiolie can be contacted at (215) 378-4175.

When your plan has been approved and all closure activities have been completed, please execute the enclosed closure certification forms and forward them to Mr. Maiolie. If you have any other questions or if I may be of further service, please do not hesitate to call.

ames A. Dolan

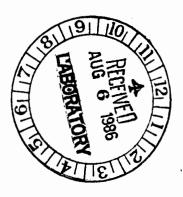
Waste Management Specialist

JAD/bas

CC: Division of Facilities Management

B. Beitler

M. Maiolie



OWNER OR OPERATOR CERTIFICATION OF CLOSURE

The undersigned,		, a (1) Corporation,
· (1	Name of Owner	or Operator), a (1) Corporation,
incorporated under the laws in the S	tate of	and licensed to do business in
Pennsylvania, or (2)	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·
Pennsylvania, or (2) (Partners)	nip, Individual,	Municipality or Other Entity)
with its principal place of business a	t	, which
•		(Address)
formerly owned or operated a hazard	dous waste	scription of Hazardous Waste Activity)
,	The	scription of Hazardous Waste Activity)
(hereinafter "Facility") known as	(50	and
dictematici, racinty / known as	/Nome of Uses	rdous Waste Facility)
located at	(Name of Haza	dous waste racinty)
located at	·	
	(Loca	
in County, Pennsy	Ivania, has con	pleted and permanently ceased the
active operation of the facility and i	as fully implem	pented all measures relating to the
closure of the facility as set forth in		
Department of Environmental Resou	rces for said ta	cility.
NOW, THEREFORE, I (w	e)	Name of Owner/Operator)
, , , , , , , , , , , , , , , , , , ,	7	Jame of Owner/Operator)
haraby eweer and affirm that the above	" The second base over	value of Owner/Operator/
mercey swear and arm in that the ab	ore-named naz	n dods waste ractiffy has been closed in
accordance with the facility's Closur		
, 19_, that all	measures relat	ing to the closure of the facility required
		the Department codified at 25 Pa. Code
Chapter 75 have been fully implement		
violations continue to exist that may	nave arisen pr	or to closure.
•		
,	•	
(Signature)		
,		
(Title)		•
(Address)		
, , , , , , , , , , , , , , , , , , ,		
Taken, sworn and subscribed before		
day of	A.D. 19	

(Notary)

OWNER OR OPERATOR CERTIFICATION OF CLOSURE

The undersigned,	, a (1) Corporation, wner or Operator)
(Name of O	wner or Operator)
incorporated under the laws in the State of	and licensed to do business in
(Partnership, Individ	ual, Municipality or Other Entity)
with its principal place of business at	, which
	(Address)
formerly owned or operated a hazardous waste	
	(Description of Hazardous Waste Activity)
(hereinafter "Facility") known as(Name of I	and
(Name of I	Hazardous Waste Facility)
located at	•
	Location)
in County, Pennsylvania, has active operation of the facility and has fully in closure of the facility as set forth in the Closus Department of Environmental Resources for sa	re Plan approved by the Pennsylvania
NOW, THEREFORE, I (we)	(Name of Owner/Operator)
hereby swear and affirm that the above-named accordance with the facility's Closure Plan appoint, 19, that all measures by the Closure Plan and the rules and regulation Chapter 75 have been fully implemented, and the violations continue to exist that may have arise	proved in writing by the Department on relating to the closure of the facility required ons of the Department codified at 25 Pa. Code that to the best of my (our) knowledge, no
(Signature)	-
(Title)	-
(Address)	_ ·
Taken, sworn and subscribed before me, this day of A.D. 19	-
(Notary)	

PROFESSIONAL ENGINEER CERTIFICATION OF CLOSURE

Ι,	, a Professional Engineer registered
(Name)	
pursuant to the Professional Engineerify that I have reviewed the	neers Registration Law, 63 P.S. \$\$148 et seq., hereby closure Plan for the
	(Type of Facility) ("facility"), located
(Name of Hazardou	
at	•
	(Location)
made visual inspection(s) of the a aforementioned facility has been facility's closure plan approved in	ing to closure of such facility, and that I personally have forementioned facility, and that the closure of the performed in full and complete accordance with the writing by the Department of Environmental Resources on, and the rules and regulations of the Department 75.
· ·	
,	
(Signature)	(Date)
	•
(Professional Engineering Lic	ense Number)
(Business Addres	(Seal)
(Dusiliess Addres	S) (Deal)
(Telephone Numb	er)

PROFESSIONAL ENGINEER CERTIFICATION OF CLOSURE

1,	, a Professional Engineer registered
(Name)	
pursuant to the Professional Engineers Regis certify that I have reviewed the Closure Plan	n for the at
• • • • • • • • • • • • • • • • • • •	(Type of Facility) ("facility"), located
(Name of Hazardous Waste Fac	
at	cinty)
	ation)
made visual inspection(s) of the aforementionaforementioned facility has been performed facility's closure plan approved in writing by	are of such facility, and that I personally have oned facility, and that the closure of the
	•
(Signature)	(Date)
	·
(Professional Engineering License Numb	er)
	<u> </u>
(Business Address)	(Seal)
(Telephone Number)	

ER-W04-500: Rev. 11/93 Part A

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

RECEIVED

JUN 1 9 1997

KIWI BRAND. ENVIRONMENTAL AFFAIRS

Date of Inspection	6-12-97	Time start	Time fini	sh
Name of Inspector	Susan Mi Wer	ner		
Company, installation	name <u>Kiwi</u> B	rands Inc.		
Location 44	7 old Swede 1	Poad		
County Berks		Municipality	Anity Twf)
Identification number	PAD 097 153	399		
Name of responsible o	fficial Mike Me	llinger FA	Vironmental A	Krage.
TitleE	nviron mental ASS	airs Manage		
Mailing Address	447 old Swede	Road Dov	glassville PA	19518-1239
	ne number 610	_		
	iewed Mike			
Title	Environ	mental Affai	is Manager	
Mailing address (if diff	erent from above)	Same		
Area code and telepho	ne number	Same		
Current waste har				
a. ☐ On-site	_	storage,	☐ disposal	□ PBR
b. On-site		reuse,	□ recycle,	☐ reclaim
_	treatment,	_		
d. □Off-site		reuse,	recycle,	☐ reclaim
2. Amount of hazard	dous waste produced:	•		
	39,9	kg./mo.		
	13.4			
		•		
 Types of hazardo location and type 	ous waste produced by).	Hazardous Waste	Number and destina	ation facility (include
Waste Number	Destination	Facility	Location	and Type
1001 , 1006, 1007, 1018	ENSCO GAD OF	00222083	Dalton GA	Disposal, Blending
F003 F005 U116				7
				

Source Reduction: \boxtimes accomplished, \bowtie proposed, \square not proposed

ER-WM-300: Rev. 11/93 Part B

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name	Kiw;	Brands	Inc.	ID Number	PAD 097 153399	Date	06-12-97	

Hazardous Waste Inspection Report Generators - Part B

	STA	TUS	_		Ompliance CHAPTER	LINE
1	2	3	4	REQUIREMENT	CITATION	ITEM
1		1		Hazardous waste determination, performed on all waste streams	262.11	H001
1				Identification number	262.12	H002
l				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
	2			Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
	2			PA manifest used for intrastate shipments	262.20(b)	H005
1				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
١				Manifests filled out properly and completely	262.20(g)	H007
1				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
		3		Proper U.S. DOT shipping containers or packages being used	262.30(1)	Н009
		3		Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
1				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
1				Placards offered to transporter	262.33	H012
1				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
1				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
l				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
١				a). All containers of haz. waste in good condition	265.171	H016
1				b). Containers compatible with hazardous waste being stored within	265.172	H017
T				c). Containers of hazardous waste kept closed	265.173(a)	H018
1				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
1				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
1				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
ı				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176177	H022
. 1				h). Proper containment and collection system(s)	265.178	H023
				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
1				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

Hazardous Waste Inspection Report Generators - Part B 2-Not-Applicable 3-Not-Determine

	•		1-	No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-	Compliance	
•	STA	TUS	4	CHAPTER CITATION	UM.	
, i	┢	 	Ė	Records retained at designated location for 20 years	262.40(a)	H026
	2			Quarterly reports submitted to the Department	262.41(a)	H027
١		T	 	Exception reporting procedures followed	262.42	H028
	2			Hazardous waste disposal plan, if required	262.45	H029
1				Spill reporting procedures followed	262.46(a)	H030
1				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	2			Special requirements followed for international shipments	262.50,.53, .55, .60	H032
1				Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: June 12, 1997

Identification Number: PAD097153399

Company/Facility/Site Name: Kiwi Brands, Inc.

I arrived on-site and met with Mr. Mike Mellinger. We proceeded on an inspection of the hazardous and residual waste generation and storage areas.

38 drums of hazardous waste and 29 drums of residual waste were observed in the main drum storage area. This area has been upgraded since the last inspection. During the last inspection, cracks were observed in the floor near the drums. Since then, the cracks have been filled and the floor painted with a sealant. Steel sealed curbing has been installed all around the storage area with soft dikes at the access points for tow motors to get in and out.

All the drums in the storage area were properly labelled and all labels were visible for inspection.

There were 8 drums of hazardous waste in the aerosol waste storage area. These drums were also properly labelled and visible.

The facility has three pits behind the building which are used to evaporate liquid waste from the production lines. This waste is non-hazardous and the sludge is removed to ENSCO in GA.

The facility also has a compactor dumpster for the plant trash. This dumpster is taken to Pottstown Landfill as a residual waste.

The facility is now placing all hazardous wastes into drums which are painted black with a white stripe around the middle. This is so these drums can be easily identified.

3 full drums of flammable waste were observed in the flammables room and 1 partial drum being filled. All the drums were closed and properly labelled.

After completing the inspection of the facility, we returned to the office to review the records.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

rson Interviewed (Signature)	el			Ü	ngen	_ Date	6-19-97	
Inspector (Signature)	We	w	ኅ			_ Date	6-19-97	_

Page 4 of 5

File name:1C_KIWI.DOC

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: June 12, 1997

Identification Number: PAD097153399

Company/Facility/Site Name: Kiwi Brands, Inc.

Hazardous Waste Biennial Report

The 1996 Biennial Report contains information about wastes generated in 1995. During 1995, the facility generated 136232 pounds of hazardous waste or 61643.4 kilograms. This works out to 5136.9 kilograms per month making the facility a large quantity generator.

Storage Area Inspection Logs

The storage areas are inspected on a daily basis and the log is filled out once a week. These logs were reviewed for the period of January 1997 to present.

Preparedness, Prevention, and Contingency Plan

This plan was updated on January of 1997 and includes all personnel changes.

Source Reduction Strategies

The SRS were written in 1992 and 1994. The facility is planning to update them after July 1, 1997.

Manifests

Manifests were reviewed for the period of January 1997 to present. During this period all waste shipped where en to ENSCO in GA.

Employee Training

Employee training was conducted in December of 1996 and is planned again in December of 1997. All employees who handle hazardous wastes were trained.

	1 1 1 11	
on Interviewed (Signature)	Willellinger	Date 6-19-97
Inspector (Signature) Jusan 777	. Weine	Date 6-19-97

In the "Requirement" Section of this Inspection report, each listed Inspection Item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.



447 OLD SWEDE ROAD, DOUGLASSVILLE, PA 19518-1239 • PHONE: (610) 385-3041 • FAX. (610) 385-6177

30 January 1998

PA DEP Bureau of Land Recycling and Waste Management P.O. Box 8550 Harrisburg, PA 17105-8550

RE: 1997 HAZARDOUS WASTE REPORT

Dear PA DEP:

Enclosed please find the 1997 Hazardous Waste Report for Kiwi Brands. The individual reports included are:

- Form IC one form
- Form GM seven forms (HW-2, HW-4, HW-5, HW-6, HW-11, HW-12, HW-13)

If you require additional information or have any questions, please contact me at 610-385-9246.

OV, Mollinger

Cordially,

Michael V. Mellinger, Ph.D., REM Environmental Affairs Manager

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:	U.S. ENVIRONMENTAL PROTECTION AGENCY
SITE NAME: KIWI BRANDS	1997 Hazardous Waste Report
EPA ID NO: PAID Q917, 153, 3919	FORM IDENTIFICATION AND CERTIFICATION
Instructions: Please see the detailed instructions beginni completing this form. In addition, the page number for instructions beginning the page number for instructions.	
Sec. 1 Site name and location address. Check the box 0 in items / absent, enter iniormation. Instructions page 7.	L. B, C, E, F, G, and H if same as label; if different, enter corrections. If label is
A. EPA ID No. Same as label 0 or → (PIAID) (01917) (1 1513) (3 1919)	B. County Same as label □ or → Berks
C. Site/company name Same as label □ or → Kiwi Brands	D. Has the site name associated with this EPA ID changed since 1995? □ 1 Yes □ 2 No
E. Street name and number. If not applicable, enter industrial park, but Same as label □ or → 447 01d Swede Road	iding name, or other physical location description.
F. City, town, village Same as label □ or → Douglassville	G. State Same as tabel □ or → 0r → P A H. Zp Code Same as tabel □ or → [1, 9, 5, 1, 8, -, 1, 2, 3, 9]
Sec. II Mailing address of site. Instructions page 7.	
A. Is the mailing address the same as the location address? B. Number and street name of mailing address	/es (SXIP TO SEC. III) 0 2 No (CONTINUE TO BOX 8)
C. City, town, village	D. State E. Zip Code
Sec. III Name, title, and telephone number of the person who should	be contacted if questions arise regarding this report. Instructions page 7.
A Last Name First name M.i. Mellinger Michael V	B. Time C. Telephone Number Environmental 6,1,0,3,8,5,-,9,2,4,6, Affairs Mger Extension [1,1,1,1]
	hyments were prepared under my direction or supervision in accordance with a
system designed to assure that qualified personnel properly of person or persons who manage the system, or those persons to the best of my knowledge and belief, true, accurate and co	gether and evaluate the information automitted. Based on my inquiry of the sidirectly responsible for gathering the information, the information submitted is, implete. I am aware that there are significant penalties under Section 3008 of false information, including the possibility of fine and imprisonment for knowing
system designed to assure that qualified personnel properly of person or persons who manage the system, or those persons to the best of my knowledge and belief, true, accurate and continue the Resource Conservation and Recovery Act for submitting	gather and evaluate the information submitted. Based on my inquiry of the sidirectly responsible for gathening the information, the information submitted is, implete. I am aware that there are significant penalties under Section 3008 of

EPA 10 NO. (P 1A | D) (0, 9, 7) (1, 5, 3) (3, 9, 9)

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Sec. V Generator status. Instructions	begin on page 8.						
A. 1997 RCRA generator status	B. Reason for not generating		į				
(CHECK ONE BOX BELOW)	(CHECK ALL THAT APPLY)						
● 1 LOG □ 2 SOG □ 3 CESOG □ 4 Non-generator (CONTINUE TO BOX B)	□ 1 Never generated □ 5 Periodic or occasional generator □ 2 Out of business □ 6 Waste minimization activity □ 3 Only excluded or delisted waste □ 7 Other (SPECIFY IN COMMENTS BOX BELOW) □ 4 Only non-hazardous waste						
Sec. VI On-site waste management sta	atus. Instructions page 10.						
A. Storage subject to RCRA permitting re	quirements	Treatment, disposal, or recycling subject to RCRA permitting requirements					
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Comments:			er se≇ ê				
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BEFORE ENTER:	COPYING FORM, ATTACH SITE IDENTIFICATI	ON LABEL OR			ENVIRONMENTAL ECTION AGENCY
SITE NA	ME KIWI BRANDS			1997 Ha	zardous Waste Repor
EPA ID N	ю <u>(P, A, D, O, 9, 7, С1, 5, 3, с3, 9</u>	1.9	FORM GM		TE GENERATION MANAGEMENT
Instruct comple	tions: Please see the detailed instruction ting this form. In addition, the page nur	ns beginning on p mber for instruction	age 11 of the instru hs specific to each t	ections and f box is provid	orms booklet before ded in parentheses.
Sec. I	A Waste description (page 12) Combus Waste washout solvent contain		from processi spirits (DO	ng equipm Ol) NA 19	ent washouts 93 PGIII (HW-2)
B. EPAI			C State hazardous w	•	• 13)
D. SIC o	12. 0	F. Source code (page 14) (A_10_19_1	measurement (pa		I. RCRA-radioactive mixed (page 14)
Sec. I	A. Quantity generated in 1997 (page 15) B. UC (page Density)	15)		e on site, or dis	g to this waste: treat on site, charge to a sewer/POTW?
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Site 1	B. EPA ID No. of facility waste was shipped to (page 17)	C. System type shipped to (p. 17) [N 1 1 4 1]	D. Off-site availability code (page 17)	1	nary shopped in 1997 (page 17)
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BEFORE ENTER:		TTACH SITE IDENTIFICATE	ON LABEL OR	Aug may		NVIRONMENTAL
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		e the detailed instruction addition, the page num				
Sec. I	A. Waste descripto Flamma Waste solve	n (p age 12) ble liquid nts containing *	001, D022, F0 elone, ethano	002, F003, F009 ol, toluene, a	5 3, UN nd isoprop	1993, PG II anol (HW-4)
B. EFA (page 12	hazardous waste cod		O ₁ 2 ₁ 2 ₂ O ₁ O ₂ 5	C. State hazardous wi		13) ABART A
D. SIC o (page 13 L		E. Origen code [] (page 13) System Type [N] []	F. Source code (page 14) - (A <u>j 9j 4</u> j	measurement (pa		RCRA-radioactive mixed age 14)
Sec. II	A. Quantity general (page 15)	8,7,2, 0, Density	15)	•	e on site, or disch	to this waste: treat on site, harge to a sewer/POTW?
On-site ((page 16	PROCESS SYSTEM 1 process system type B)	Quantity treated, disposon site in 1997 (page 1	6)	ON-SITE PROCESS SYS On-site process system (page 16)	n type Quantity on site in	treated, disposed, or recycled in 1997 (page 16)
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	BEFORE ENTER:	COPYING FORM, A	TTACH SITE IDENT	IFICATION	U.S. ENVIRONMENTAL PROTECTION AGENCY				
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1	Sec. I	A. Waste description Waste a	n (page 12) erosols - re		DOO1, DO39 d consumer pr		lab sample	es (HW-5)	
	B. EPA (page 12	hazardous waste cod	• (D ₁ O ₁ O ₁ 1			C State hazardou		age 13)	
	D. SIC (page 13		E. Origin code []_ (page 13) System	Type	F Source code (page 14) - (AJ5 17)	G Point of measurement p 14) 3	H. Form code (page 14) [8] 8 0 1	I. RCRA-radioactive mixed (page 14)	
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BEFORE ENTER:	BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:							U.S. ENVIRONMENTAL PROTECTION AGENCY		
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B. EPA (page 12		ous waste cod			<u></u>	C. State hazardou		90 13) 10 201 10 10 10 10 10 10 10 10 10 10 10 10 1		
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	BEFORE	E COPYING FORM, ATTACH SITE IDENTIFICATION:	N LABEL OR	And the same	U.S. ENVIRONMENTAL PROTECTION AGENCY			
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		ctions: Please see the detailed instructions eting this form. In addition, the page numb						
	366.1	A. Waste description (page 12) Off-spec Waste bulk polish containing	material mineral spi	Combustible (DOO1)	e liquid NA1993, PG III (HW-11)			
- 1	B. EPA (page 12	hazardous waste code DIOIOII			waste code (page 13)			
	D. SIC ((page 13		F. Source code (page 14) - [A <u>1517</u>]	measurement (p	I. RCRA-radioactive mixed (page 14) . B 14 10 19			
	\$-6. 1 WTC-40	L 1 1 1215141419 (0) Density		C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (page 15) 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) 2 No (SKIP TO SEC. III)				
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BEFORE COPYING FORM, AT ENTER:	TACH SITE IDENTIFICATION	ON LABEL OR	110 Page	U.S. ENVIRONMENTAL PROTECTION AGENCY
SITE NAME: KIWI	BRANDS			1997 Hazardous Waste Report
EPA ID NO: MEPLALD LO	1917 (11513) (3.9)	9	FORM GM	WASTE GENERATION AND MANAGEMENT
				ctions and forms booklet before box is provided in parentheses
Sec. I A. Waste description Waste BCDMF	DOOL OX		d 5.1 UN 1479 umer products	9 PG II & off-spec material (HW-13)
B. EPA hazardous waste code (page 12)	T		C. State hazardous wa	uste code (page 13)
	E. Origin code [] code (page 13) System Type: [N] []	F. Source code (page 14) . [A] 5, 7	measurement (pa	Form code I. RCRA-radioactive mused (page 14) (page 14)
Sec. II A. Quantity generate (page 15)	1,8,0, 0 Density	(5)	dispose on site, recycle (page 15)	of the following to this waste: treat on site, on site, or discharge to a sewer/POTW? O ON-SITE PROCESS SYSTEM 1)
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447 OLD SWEDE ROAD, DOUGLASSVILLE, PA 19518-1239 . PHONE: (610) 385-3041 . FAX: (610) 385-6177

11 May 1999

Ms. Hilary Livingston, Project Manager Pennsylvania Operations Branch USEPA, Region III 1650 Arch Street Philadelphia, PA 19103-2029

RE: Corrections to "ENVIRONMENTAL INDICATOR INSPECTION REPORT" dated December 1, 1998 prepared by USACOE

Dear Ms. Livingston:

As we discussed on 10 May 1999 there are incorrect combinations of facts in the above report in the section titled "Meeting Summary, B. Description of all Solid Waste Management Units (SWMUs) and/or Areas of Concern (AOCs) as well as description of known and/or potential releases. Past hazardous material releases at the site include the following: "starting on page 2. Information from one release was incorrectly associated with another release. I have written the correct passages below.

• January 29, 1988 - Approximately 700 gallons of mineral spirits released (refer to Figure 4). During a bulk delivery of mineral spirits to an underground storage tank, a faulty tank level indicator caused a tank overfill. Cleanup operations were immediately undertaken, and included collection of any recoverable mineral spirits, excavation of approximately 120 tons of contaminated soil and installation of three recovery wells. The contaminated soil was properly disposed as weighed by the disposal manifest. In a letter dated September 20, 1989 from Mr. Edward Strauch, Jr., Manager, Analytical & Environmental Affairs at Kiwi Brands to Mr. Michael Maiolie of PADEP "Well testing was performed every six months to monitor the residual solvent level." The results from sampling on July 2834 989 verified that the solvent level was less than the analytical detection limit.

September 13, 1994 - Approximately 115 gallons of mineral spirits released (refer to Figure 4). A tanker delivering mineral spirits accidentally released mineral spirits to the ground near the tank pumphouse due to a valve not being closed before a pump was activated. Immediate containment was accomplished. Contaminated soil and asphalt were excavated and sent offsite for disposal. The excavated area was refilled with clean soil. In a letter from Dr. Mellinger to Ms. Susan Kinkaid of PADEP dated November 23, 1994 Kiwi presented a "Certificate of Soil Remediation" from Soil Remediation of Philadelphia, Inc. confirming that the soil contaminated by the release was properly disposed.

NOTE: Figure 4 should also be amended by adding the September 1994 release information into the box for Mineral Spirits Releases (but not from former UST's since the UST's had been removed before this release.

The last two sentences in the current version of the report for the <u>January 29, 1888</u> release starting with "In late 1993, Kiwi removed the UST..." are not part of the information for this release. The information actually refers to work Kiwi Brands did in connection with removing our mineral spirits UST's and replacing them with AST's.

I hope this explanation will help to clarify the releases and related information for our site. If you have any questions or need additional information, please contact me at 610-385-9246.

Cordially,

Michael V. Mellinger, Ph.D., REM

Environmental Affairs Manager